



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

APR 17 2006

CERTIFIED MAIL NO. 7005 2570 0001 6436 4705  
RETURN RECEIPT REQUESTED

Re: Warning Letter and Certification of Violation Correction for National Steel and Shipbuilding Company

John Martin  
Environmental Engineering Specialist  
National Steel and Shipbuilding Company  
P.O. Box 85278  
San Diego, CA 92186-5278  
EPA Identification Number: CAD009158932

Dear Mr. Martin:

On November 16, 2005, a hazardous waste compliance inspection was conducted by representatives of the United States Environmental Protection Agency ("EPA"), accompanied by a representative of San Diego County Department of Environmental Health, at National Steel and Shipbuilding Company (NASSCO), located in San Diego, CA, with EPA Identification Number CAD009158932. During the course of this investigation, information was gathered in accordance with Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), as amended {42 U.S.C. § 6927(a)}.

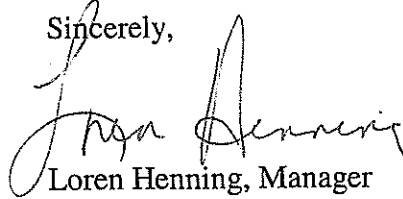
The November 16, 2005 compliance evaluation inspection found violations of RCRA at NASSCO that were corrected during the course of the inspection or immediately afterwards. A copy of the inspection report is enclosed for your information ("Enclosure"). This letter should not be construed as a determination by the EPA of your compliance with any other applicable regulation.

The EPA routinely provides copies of inspection reports to state or tribal agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations, 40 C.F.R. Part 2, Subpart B. For any portion of the information included in this inspection report which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As described in 40 C.F.R. § 2.203(a)(2), the EPA will construe the failure to furnish a confidentiality claim within fourteen (14) calendar days from the date of your receipt of this letter as a waiver of

that claim, and information may be made available to the public by the EPA without further notice.

If you have questions related to the inspection report or this letter, please contact Clint Seiter of my staff at (415) 972-3298.

Sincerely,

A handwritten signature in dark ink, appearing to read "Loren Henning". The signature is fluid and cursive, with the first name "Loren" being more prominent than the last name "Henning".

Loren Henning, Manager  
RCRA Enforcement Office

Enclosure

cc (w/o enclosure): Charles McLaughlin, California Department of Toxic Substances Control  
John Kolb, San Diego County Department. of Environmental Health



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

**WASTE MANAGEMENT DIVISION**

**RCRA ENFORCEMENT OFFICE**

**Purpose:** RCRA Compliance Evaluation Inspection

**Facility:** National Steel and Shipbuilding Company  
2798 Harbor Drive  
San Diego, CA 92113

**EPA ID Number:** CAD009158932

**Date of Inspection:** November 16, 2005

**EPA Representatives:** Clint Seiter  
Environmental Protection Specialist  
(415) 972-3298

Jim Polek  
Environmental Protection Specialist  
(415) 972-3185

**San Diego County Dept. of  
Environmental Health Inspector:**

John Kolb  
Supv. Environmental Health Specialist  
(619) 338-2472

**Facility Representative:** John Martin  
Environmental Engineering Specialist  
(619) 544-3553

**Report Prepared By:** Clint Seiter

**Report Date:** December 19, 2005

## BACKGROUND

### Facility Description

National Steel and Shipbuilding company ("NASSCO" or "the facility") designs and builds ships, specializing in auxiliary and support ships for the U.S. Navy and oil tankers and dry cargo carriers for commercial markets. Per the facility representative, approximately 80% of the facility's resources is devoted to the construction of new vessels and the additional 20% is devoted to repairing existing vessels. NASSCO is one of three shipyards in the Marine Systems group of General Dynamics Corporation, headquartered in Falls Church, VA. NASSCO is located at 2798 Harbor Drive, San Diego, CA and currently employs 4146 people (1142 in administrative capacities, 3004 in actual ship production). NASSCO has been in operation at this site under its current management since 1960.

NASSCO submitted a Notification of Regulated Waste Activity to EPA on August 11, 1980, identifying itself as a generator of D001 (ignitable), D002 (corrosive), F001, F003, and F005 RCRA hazardous wastes. NASSCO submitted a 2003 Biennial Report confirming that it is a large quantity generator of the following RCRA hazardous waste streams:

EPA ID# CAD009158932	
Waste code	Waste description
D001/D035	Ignitable paint solids from shipbuilding paint operations
D007/D008	Abrasive blasting material used to remove paint from metal surfaces and tank cleaning
D001	Rags containing oil and solvent from metal surface cleaning
D007	Paint solids from hydroblasting operation on ship hull surface containing chromium
D005/D007	Baghouse dust generated during metal cutting operations for shipbuilding
D001	Ignitable paint solvent used for metal surface cleaning and cleaning paint
D002/D007	Corrosive acid from various shipbuilding processes to clean metal
D011	Developer and fixer solutions from photographic development
D039	Spent solvents from degreasing and cleaning operations
D008	Lead metal debris from shipbuilding

A manifest review for the year 2005 indicates that NASSCO still qualified as a large quantity generator of RCRA hazardous waste at the time of the inspection.

Per the EPA enforcement database, the facility had not been inspected by EPA prior to this inspection. NASSCO was last inspected by the California Department of Toxic Substances Control (DTSC) on April 22, 2004. Generator related violations were noted during this inspection, and the facility was recorded as having returned to compliance effective July 6, 2004.

## **MANUFACTURING PROCESS**

Steel plates, including shapes, angles and I-beams, are transported onto the NASSCO premises via railroad or truck. Dirt is blasted off the plates by means of steel shot, preparing the plate surface for the paint application. Spent shot is transported to the California Portland Cement Co. as an excluded recyclable material used in the manufacture of cement.

The steel shapes and plates are cut to specified dimensions either by dry cutting methods (generating an excluded recyclable dust) or by wet cutting methods (generating waste water processed through the facility's waste water treatment center).

The cut steel plates (typically ranging in dimensions from 10' x 20' to 10' x 40') are welded together into larger panels. Stiffeners (steel beams) are welded onto the panels for reinforcement.

Panels are welded together into "blocks" that will ultimately make up the ship. Once a block is completed, the subsystems are added such as lights, ventilation systems, ladders, etc. The major hazardous waste streams generated at this stage of construction are industry wipes contaminated with solvents.

"Blocks" are next assembled into "grand blocks." This stage of construction includes painting operations, where solvent-based (and, in some instances, copper-based) paints are used. Hazardous wastes generated at this stage include paint-related wastes and solvent-contaminated rags and personal protective equipment (PPE).

The completed and outfitted ship is launched for a series of tests. Oil used to flush out ship systems is the predominate waste stream generated at this phase.

Spent solvents generated throughout the different phases of construction are processed through a solvent distillation still. The still is cleaned out weekly, with the generated sludge being disposed of as a RCRA hazardous waste.

Repair work (for which the majority consists of Navy vessels) is conducted either pier side or in dry docks. Painting can consist of several coats (including anti-corrosive paint as well as anti-foulants (used to prevent growth of marine life on the ship's under surface)). Blasting operations remove existing paint from the ship, and the spent grit is managed as an excluded recyclable material.

## INVESTIGATION

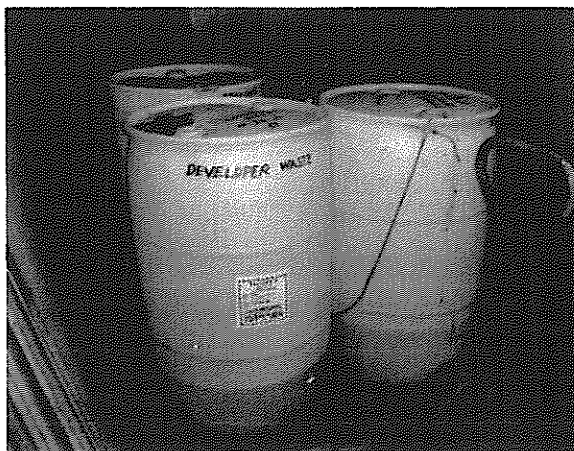
The purpose of the investigation was to determine compliance of NASSCO with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268 and 279, and the California Code of Regulations (CCR), Title 22, Division 4.5 and the California Health and Safety Code, Division 20. On November 16, 2005, Clint Seiter and Jim Polek, representing the U.S. Environmental Protection Agency (EPA), and accompanied by John Kolb from the San Diego County Department of Environmental Health, conducted an unannounced site investigation at NASSCO, San Diego, CA (ID# CAD009158932). Upon providing introductions and credentials, the inspectors contacted Mr. John Martin, Environmental Engineering Specialist. The inspectors explained that this was a routine inspection to determine whether or not the facility was in compliance with federal and state regulations concerning the proper management of RCRA and non-RCRA hazardous wastes. The inspection would consist of a walkthrough of the facility, focusing on those areas where hazardous wastes were handled or stored, with photos taken, followed by a record review and a post-inspection outbriefing.

### Walk-Through Inspection

#### Metal Photo Lab/Machine Shop

##### – Photo Lab Satellite Accumulation Area

There were three 55-gallon drums of RCRA hazardous waste stored in this area (“fixer and stop bath”, “waste developer” and “sealing additive”). The drums were closed, in good condition, and labeled properly. However, the drum containing “sealing additive” lacked adequate access as required under the California Code of Regulations (CCR), Title 22 §66265.35. This has been documented as corrected per NASSCO’s Environmental Corrective Action Request dated 11/17/05 (Attachment 1).



**Photo 2: Machine Shop SAA #1**

– **Machine Shop Satellite Accumulation Area #1**

There were three 55-gallon drums of hazardous waste stored in this area (waste coolant” and “waste oil” (both non-RCRA hazardous wastes)) and “waste solvent” (a D001 RCRA hazardous waste). The drums were closed and in good condition. Per CCR title 22 §66279/21(b), containers of used oil must be labeled with the words “USED OIL”, not “waste oil” as was done at this satellite accumulation area. Other than that, the containers were labeled properly. The drum labeled “waste oil” also lacked access, as is required under CCR title 22 §66265.35. This has been documented as corrected per NASSCO’s Environmental Corrective Action Request dated November 17, 2005 (Attachment 1).



**Photo 2: Machine Shop SAA #1**

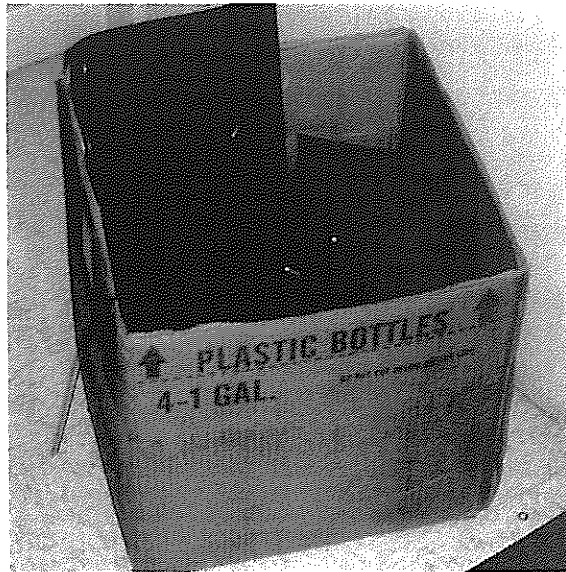
– **Machine Shop Satellite Accumulation Area #2**

There were four 55-gallon containers in this area, two containing non-RCRA hazardous waste and one containing “excluded recyclable materials.” The fourth drum (“empty containers”) did not contain hazardous waste. No violations were noted in this area.

– **Photo Lab #1**

The inspectors noted an open, unlabeled cardboard box of discarded film (a D011 RCRA hazardous waste because of its silver content). The inspectors informed the facility that this hazardous waste needed to be stored in a closed container and labeled according to the regulatory requirements for satellite accumulation area containers as described in CCR Title 22 §66262.34(e)(1)(E). Per NASSCO’s post-inspection Environmental

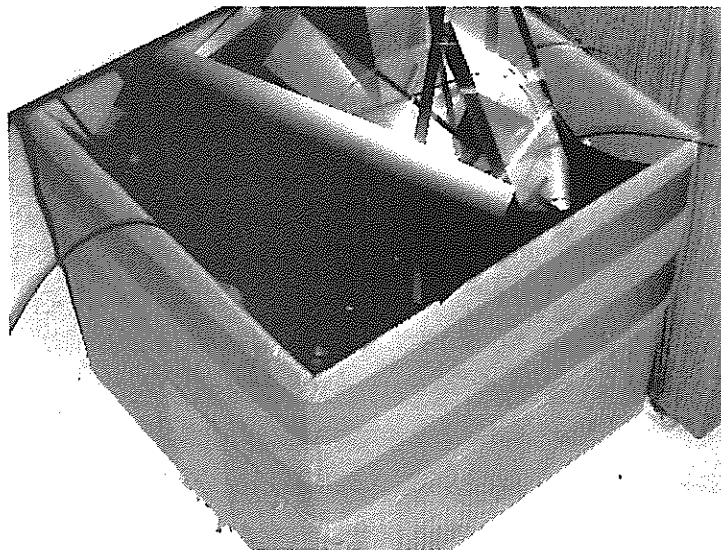
Corrective Action Request EC-2005-37 (Attachment 1): "Photographic spent film will be handled in a flop top 10 gallon container and properly labeled "hazardous waste" to identify the contents. The container will be emptied daily."



**Photo 3: Open, unlabeled box of discarded film in Photo Shop SAA**

#### **- Computer Room**

As in the Photo Lab, spent film was again stored in an open, unlabeled box. This was corrected per NASSCO's post-inspection Environmental Corrective Action Request EC-2005-37 (Attachment 1).

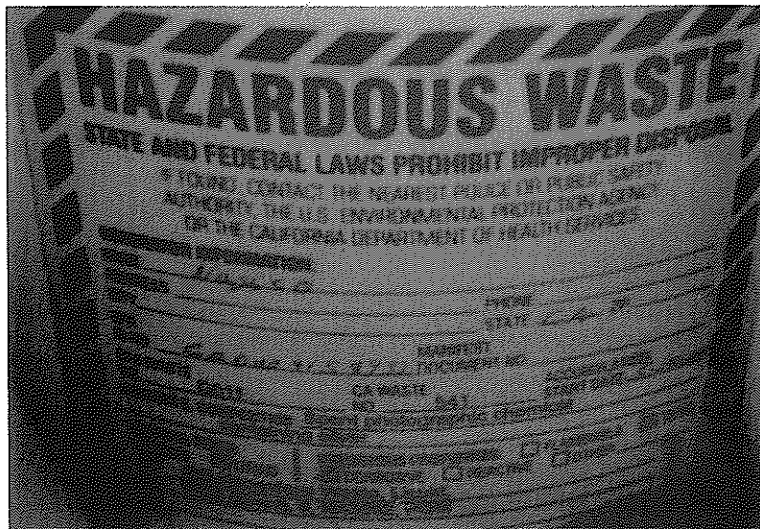


**Photo 4: Open, unlabeled box of discarded film in Computer Room SAA**



## **- Photo Lab #2**

Inspectors noted a 5-gallon bucket with a hazardous waste label identifying its contents as “Spent photographic chemical containing silver” and with an accumulation start date of May 18, 2004. Per CCA Title 22 §66262.34(e)(1)(B), a generator cannot hold a satellite accumulation container on site for a period in excess of one year. This was addressed post-inspection in NASSCO’s Corrective Action Request #EC-2005043.



**Photo 5: Photo lab #2 SAA waste in excess of one year**

## **- Machine Shop Satellite Accumulation Area #3**

The inspectors noted five 55-gallon drums of hazardous waste stored in this area. All drums were closed, in good condition and labeled properly. No violations were noted.

## **Non-Detect Testing (NDT) Building**

There were a one-gallon container identified as “spent fixer” and a one-gallon container identified as “spent developer.” Neither container conformed to the regulatory requirements for hazardous waste labeling as described under CCR Title 22 §66262.34(e)(1)(E), specifically lacking:

- the words “Hazardous Waste”;
- an accumulation start date;
- the composition and physical state of the waste;
- the hazardous properties of the waste;
- the name and address of the person producing the waste.

This has been addressed post-inspection in NASSCO’s Environmental Corrective Action Request #EC-2005-038 (Attachment 1).

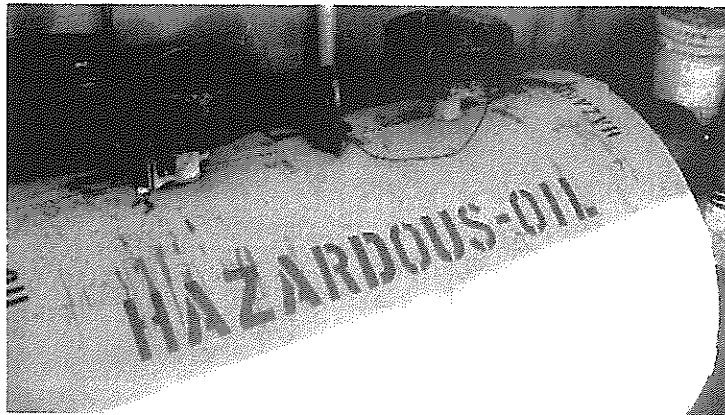


**Photo 6: Inadequately labeled containers in NDT Building**

#### **Vehicular Maintenance Area**

The inspectors noted the following:

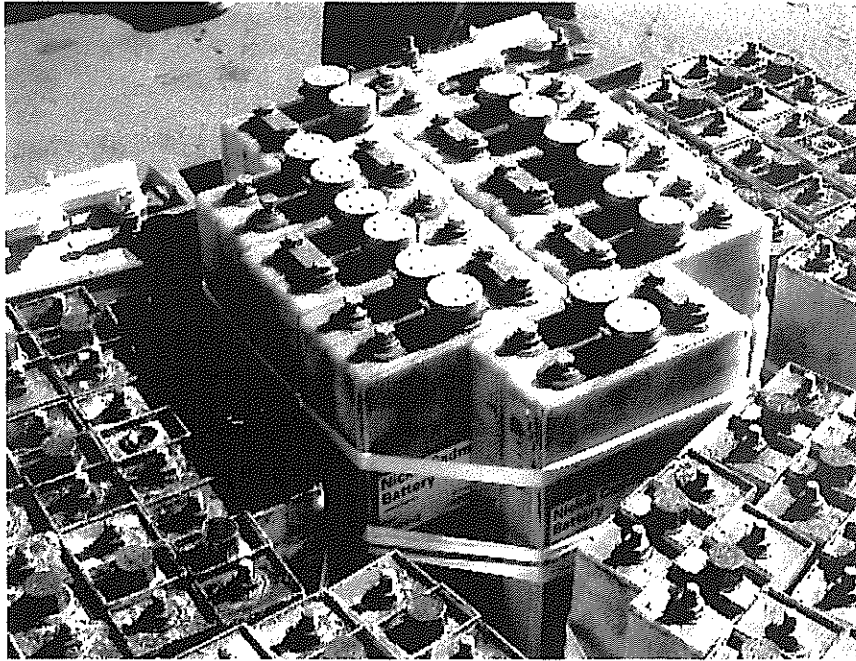
- One 250-gallon tank for used oil storage incorrectly identified as “hazardous oil” rather than “used oil”, as is required under CCR Title 22 §66279.21(b). The tank was contained and had engineering certification. However, per the Vehicular Maintenance representative, daily tank inspections were not conducted, as is required under CCR Title 22 §66265.195(a) (corrected per Environmental Corrective Action Request # EC-2005-039 (Attachment 1));



**Photo 7: Mislabeled used oil tank in Vehicular Maintenance Building**

- One 55-gallon drum of used antifreeze, closed and labeled correctly;

- One 55-gallon drum of spent transformer oil, closed and labeled correctly;
- One pallet containing lead acid batteries and nine nickel-cadmium batteries. The nickel-cadmium batteries were not containerized and labeled per the provisions for Universal Wastes as described in CCR Title 22 §§ 66273.13 and 66273.14 (corrected per Environmental Corrective Action Request # EC-2005-039 (Attachment 1));



**Photo 8: Pallet of uncontainerized/unlabeled NI-CA batteries**

- Three 55-gallon drums of non-RCRA hazardous waste and one 55-gallon drum of excluded recyclable waste (oily rags). Drums were closed and labeled properly;
- One 55-gallon drum of cleaning pit sludge, closed and properly labeled.

### **Outside Tool Room**

- There was one 55-gallon drum of spent alkaline batteries. The drum was labeled properly, but the locking ring was not secured, in violation of CCR Title 22 §66265.173(a) (open containers). This was corrected during the inspection.

### **Wastewater Treatment Area**

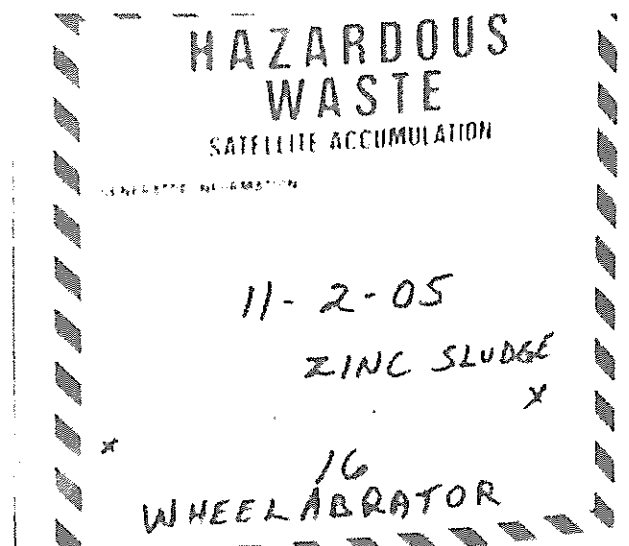
- Bilge and ballast water passes through an oil/water separator. The water is processed through the facility's wastewater treatment system, and the oil is pumped into a 6000-gallon storage tank, misidentified as "Waste Oil" instead of "Used Oil", as required under CCR Title 22 §66279.21(b) (this was corrected post inspection). No other potential violations were noted.

- There were also three 55-gallon drums of non-RCRA hazardous waste and one 55-gallon drum of excluded recyclables (solvent-contaminated rags) stored in the area. All drums were closed, in good condition and labeled properly. No violations noted.

### **Primer Line - Wheelabrator (Paint Stripper)**

Surface blasting and primer painting operations take place in this building.

- **Satellite Accumulation Area #1**
  - Two 55-gallon drums of non-RCRA hazardous waste and two 55-gallon drums of contaminated solvent awaiting processing through the facility's onsite solvent still, labeled "Excluded Recyclable Material." No violations noted
- **Wheelabrator Satellite Accumulation Area**
  - Water from the paint booth's water curtain is circulated through a centrifugal unit, generating zinc sludge, a non-RCRA hazardous waste. There were two 55-gallon drums of this zinc sludge at the Wheelabrator Satellite Accumulation Area, closed, in good condition and labeled properly. Per CCR Title 22 §66262.34(e)(1) a facility may not store more than 55 gallons of a particular wastestream at a satellite accumulation area. This has since been corrected.



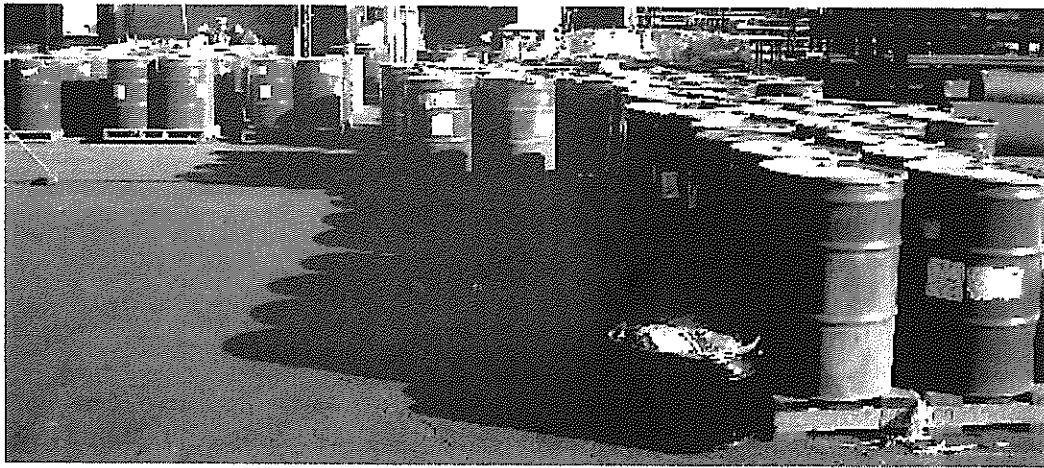
**Photo 9: Zinc sludge in Wheelabrator, SAA**

### **Waste Storage Area #1**

There were approximately 160 55-gallon drums stored in the yard at the time of the inspection. Twenty three of these drums lacked access, as is required under CCR Title 22 §66265.35 (corrected per Environmental Corrective Action Request # EC-2005-041 (Attachment 1)). The

drums appeared to be in good condition, closed, and labeled properly, with accumulation start dates indicating storage within 90 days. In addition, there were nineteen drums of used oil, incorrectly identified as “waste oil,” in violation of CCR Title 22 §66279.21(b), but otherwise labeled correctly, closed and in good condition (corrected per NASSCO’s 1-12-2006 email to EPA (Attachment 1)). There were also sixteen pallets of paint-related waste (i.e., discarded paint cans) awaiting waste determinations and recontainerization.

There was a fire extinguisher mounted nearby as required under CCR Title 22 §66265.32(c). Per the facility representative, all personnel with access to the 90-day storage area are required to carry cell phones, which addresses the requirement covered under CCR Title 22 §66265.32(c).

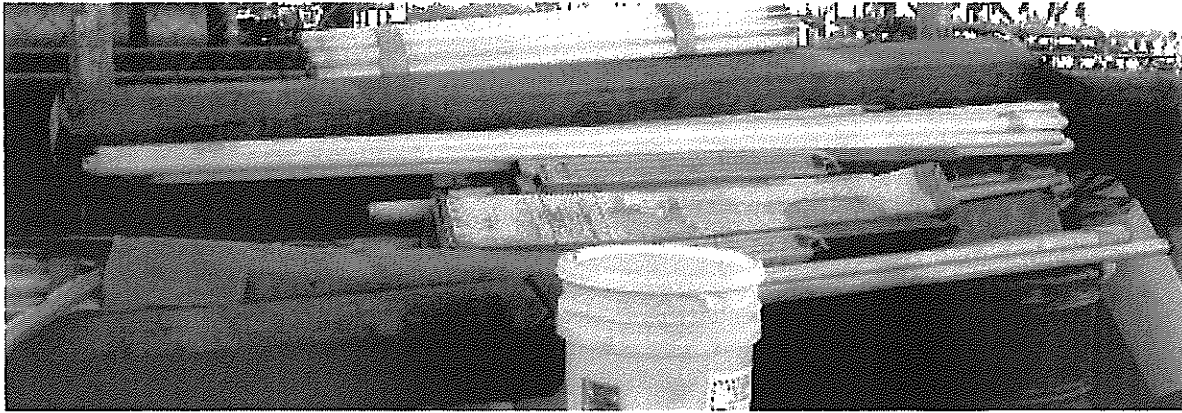


**Photo 10: Facility’s 90-day hazardous waste storage area**

#### **Waste Storage Area #2**

This storage area is a short distance away from Waste Storage Area #1, and the facility’s Universal Wastes (along with other types of waste) are stored here. At the time of the inspection, the inspectors noted the following:

- Two boxes of spent 8' fluorescent tubes, unlabeled and split at the seams;
- Three boxes of spent 4' fluorescent tubes, unlabeled and split at the seams;
- Four unboxed bundles of 8' fluorescent tubes and one unboxed bundle of 4' fluorescent tubes.



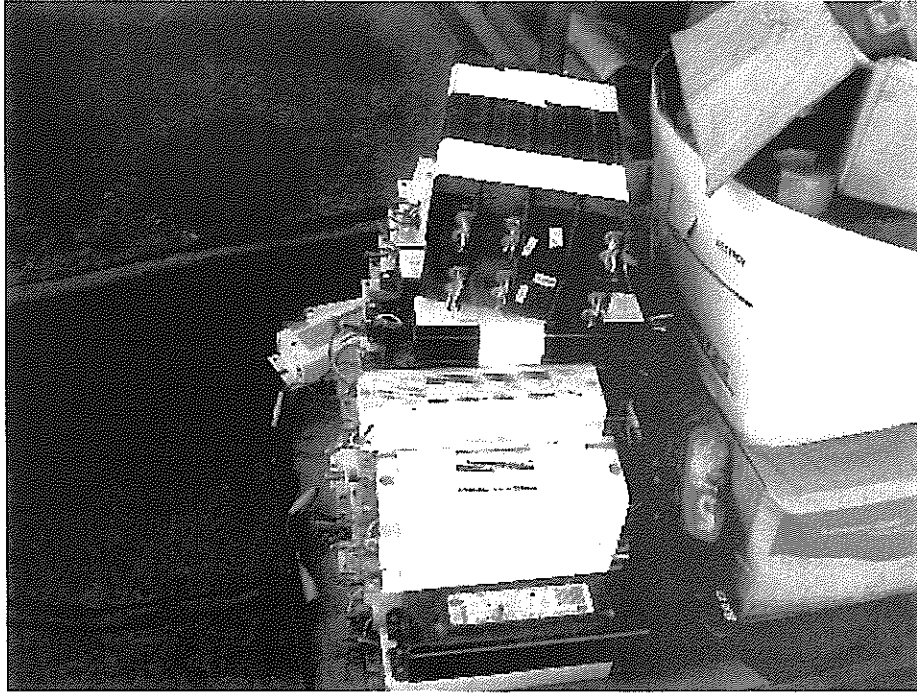
**Photo 11: Unboxed or improperly boxed spent fluorescent tubes**



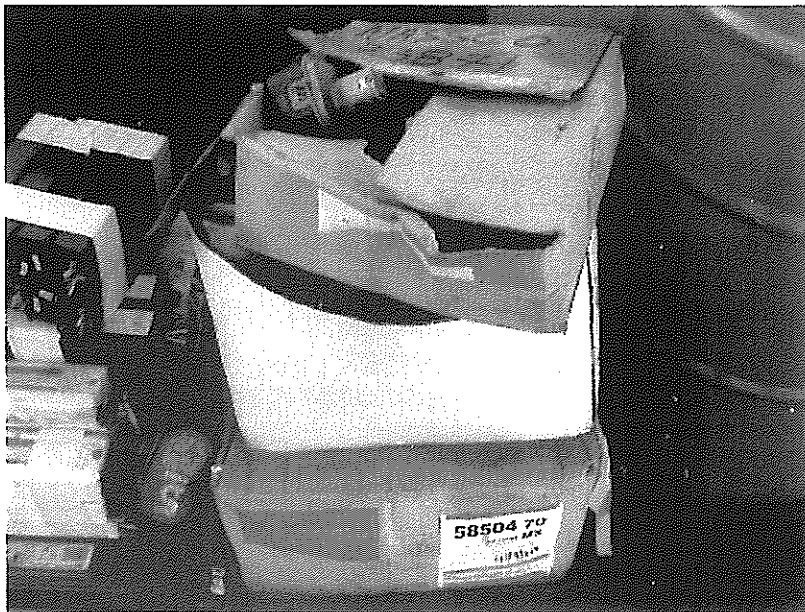
**Photo 12: Unboxed spent fluorescent tubes**

Potential violations regarding spent fluorescent tubes were corrected per Environmental Corrective Action Request # EC-2005-041 (Attachment 1))

- One cart with open and unlabeled boxes of ballasts and batteries;
- Two 55-gallon drums of broken fluorescent tubes, closed and labeled properly;
- One pallet of uncontainerized discarded ballasts;



**Photo 13: Uncontainerized discarded ballasts**

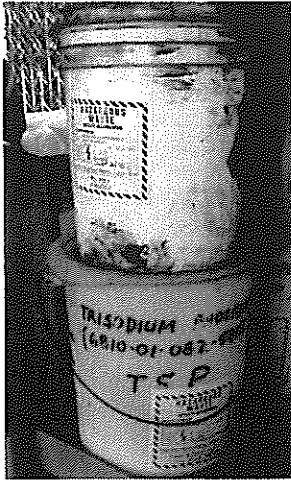


**Photo 14: Three open, unlabeled boxes of discarded NI-CA batteries**



- Three 5-gallon containers with Hazardous Waste labels (with 6-3-05 accumulation start dates), labeled as follow:
  - “Dust Acid” (one container);
  - Trisodium Phosphate (two containers) (corrected per EC-2005-41 dated 11/17/05 (Attachment 1));

Per the accumulation start dates, these hazardous wastes had been stored in the waste storage area for a period in excess of 90 days.



**Photo 15: Three 5-gallon containers of hazardous waste with 6-3-05 accumulation start dates**

- Ten 5-gallon containers of “used redlyme” from the Pipe Shop satellite accumulation area, requiring a waste determination;
- One unlabeled, open box of discarded x-ray film, identified as “scrapped lead (Pb)”;



**Photo 16: Unlabeled, open box of spent x-ray film**

- One box of sodium nitrate with a 6/3/05 accumulation start date (more than 90 days from the date of the inspection);



- One box of sodium vapor lamps without a Universal Waste label.

These potential violations have since been addressed with documentation per Environmental Corrective Action Request # EC-2005-041 and NASSCO's email to EPA dated 12-22-05 (Attachment 1).

### **Red Zone (outside Block Area)**

Paint related waste, generated within the Block Area, is temporarily stored in the Red Zone before being relocated to the 90-day storage area. At the time of the inspection there were three pallets of mostly paint related wastes awaiting relocation. No violations noted.

### **On-Block Satellite Accumulation Area**

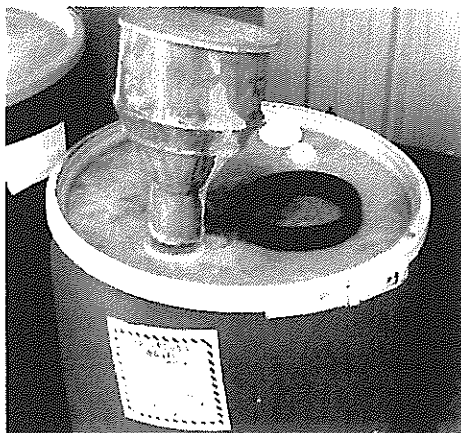
There were seven 55-gallon drums stored in this area: three were paint-related RCRA hazardous wastes, and the other four were dirty rags slated to be laundered, and identified as "excluded recyclable material."

Area of concern: partially full cans of still usable paint were stored alongside the hazardous waste containers. The inspectors requested that the facility make a better effort to segregate product from waste in this area in order to avoid confusion.

### **Pipe Shop**

- **Satellite Accumulation Area #1**

There was one 55-gallon drum identified as "mud from tank bottom," a RCRA hazardous waste. The drum was labeled properly and in good condition, however, because it had an unsecured funnel in its bung hole, the drum was technically "an open container."



**Photo 17: Pipe Shop SAA drum with unsecured funnel**

This potential violation has since been addressed with documentation per NASSCO's email to EPA dated 12-22-05 (Attachment 1).

– **Satellite Accumulation Area #2**

There were five 55-gallon drums in this area, identified as follows:

- Three drums of non-RCRA hazardous waste (including one of discarded cotton gloves);
- Two drums of excluded recyclable material (i.e., oily rags to be laundered).

The inspectors noted contaminated cotton gloves in the oily rag bins, even though, per the facility representatives, contaminated cotton gloves are discarded, not laundered and recycled. The inspectors requested that concerned facility personnel be better trained in proper disposal of the contaminated cotton gloves, i.e., they are not to be considered "excluded recyclable material."



**Photo 18: Pipe shop rag and glove 55-gallon drums**

These potential violations have since been addressed with documentation per NASSCO's email to EPA dated 12-22-05 (Attachment 1)

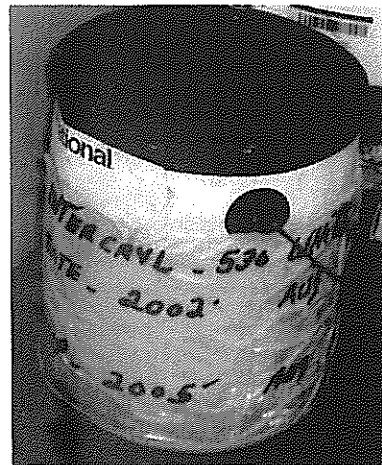
– **Solvent Still**

Contaminated solvent is distilled and recycled here, with the generated sludge being disposed as a RCRA hazardous waste. At the time of the inspection there was one 55-gallon drum of dirty rags, closed, in good condition and labeled properly.

Adjacent to the still, in the same yard, were multiple pallets of partially full paint cans, some marked with paint expiration dates, others not. Per the facility representative, the cans stored here represent product available for further use. In one instance, one 1-gallon can of solvent based paint had an expiration date of August, 2005.



**Photo 19: Pallets of paint awaiting further use near solvent still**



**Photo 20: Paint can with old expiration date**

The inspectors requested that an inventory be performed on the paint stored in this area, and if other containers of paint were found with expiration dates that have since passed, that these containers be properly disposed of. Per the facility's Work Instruction #103, dated November 29, 2005 (Attachment 1), this inventory was performed and paint-related hazardous wastes were manifested offsite for disposal on December 1, 2005.

### **Record Review**

Manifests: No violations noted.

Contingency Plan: Plan lacked the location of all fire extinguishers on the facility premises as required under CCR Title 22 §66265.52(e). Other than that, the plan was satisfactory. This issue was addressed satisfactorily in NASSCO's email to EPA dated 1/12/2006 (Attachment 1).

Biennial Report: satisfactory

Training records: The facility representative was not able to provide the training records as described in CCR Title 22 §66265.16(d)(1)-(4), specifically:

- a written description of the type and amount of both introductory and continuing training that will be given to each person listed above;
- records that document that the training or job experience required have been completed.

A sample job-description and training record was provided to EPA post-inspection in EC-2005-

041, dated 11/17/2005.

Weekly inspection logs: satisfactory

## **POTENTIAL RCRA VIOLATIONS**

### **Satellite accumulation area labeling requirements**

**Title 22 §66262.34(e)(1)(C);  
Title 22 §66262.34(e)(1)(E)  
(40 CFR §262.34(c))**

**A generator may accumulate as much as 55 gallons of hazardous waste at or near any point of generation if each container used for onsite accumulation is labeled with the words (Hazardous Waste” and with the following information:**

**(A) the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste:**

**(B) composition and physical state of the waste;**

**(C) the particular hazardous properties of the waste;**

**(D) the name and address of the person producing the waste.**

The following facility satellite accumulation areas had hazardous waste containers that did not comply with this requirement:

- Machine Shop
  - One unlabeled box of discarded film (D011) in Photo Lab #1;
  - One unlabeled box of discarded film (D011) in Computer Room;
- Non-Detect Testing Building
  - One unlabeled 1-gallon container of spent fixer;
  - One unlabeled 1-gallon container of spent developer;

These potential violations have since been documented as corrected.

**90-day hazardous waste storage area  
labeling requirements**

**Title 22 §66262.34(a)(3) and (f)  
(40 CFR §262.34(a)(3))**

**Each container used for onsite accumulation of hazardous waste shall be labeled or marked clearly with the words “Hazardous Waste”. Additionally, all containers shall be labeled with the following information:**

- the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste;**
- composition and physical state of the waste;**
- the name and address of the person producing the waste.**

The following hazardous waste containers in the facility’s 90-day storage yards did not comply with these labeling regulations:

- one box of discarded X-ray film was unlabeled;
- ten 5-gallon containers of “used rydlyme” were unlabeled.

These potential violations have since been documented as corrected.

**Storage over 90 days**

**Title 22 §66262.34(a)  
(40 CFR §262.34(a))**

**A (large quantity) generator may accumulation hazardous waste on-site for 90 days or less without a permit.**

The following hazardous waste containers had been stored in the hazardous waste storage area for periods exceeding 90 days:

- Two 5-gallon containers of trisodium phosphate (ASD: 6-3-05);
- One 5-gallon container of “dust acid” (ASD: 6-3-05);

- One box sodium nitrate (ASD 6-3-05).

These potential violations have since been documented as corrected.

## **Satellite accumulation area storage time**

### **Title 22 §66262.34(e)(1)(B)**

**A generator may accumulate as much as 55 gallons of hazardous waste in a satellite accumulation area if the generator does not hold the waste onsite for more than one year from the initial date of accumulation.**

One 5-gallon bucket of spent photographic chemical (D011) in the Machine Shop Photo Lab satellite accumulation area had an accumulation start date of 5-18-04.

This potential violation has since been documented as corrected.

## **Open containers**

### **Title 22 §66265.173(a) (Article 9) (40 CFR §265.173(a))**

**Title 22 §66262.34(a)(1)(A) states that a generator may accumulate hazardous waste on-site without a permit provided that the generator complies with the applicable requirements of articles 9 of chapter 15. Title 22 §66265.173(a) (article 9) states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.**

The following hazardous waste containers were open at the time of the inspection:

- Machine Shop
  - One unlabeled box of discarded film (D011) in Photo Lab #1
  - One unlabeled box of discarded film (D011) in Computer Room;
- Outside Tool Room

- One 55-gallon drum of spent alkaline batteries did not have a secured locking ring;
- 90-Day Storage Area
  - One box of discarded X-ray film was open;
- Pipe Shop
  - One 55-gallon drum of “mud from tank bottom” had an unsecured funnel;

These potential violations have since been documented as corrected.

### **Lack of aisle space**

**CCR Title 22 §66265.35  
(40 CFR §265.35)**

**Per Title 22 §66262.34(a)(4), a generator may accumulate hazardous waste on-site for 90 days without a permit provided that the generator complies with the requirements in articles 3 and 4 of chapter 15 and section 66265.16.**

**Title 22 §66265.35 (article 3) states that the owner must maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment.**

The following hazardous waste containers lacked access:

- Machine Shop: one 55-gallon drum of “sealing additive” lacked access;
- 90-day hazardous waste storage yard: 23 55-gallon drums of hazardous waste lacked access.

These potential violations have since been documented as corrected.

### **Incomplete contingency plan**

**Title 22 §66265.52(e)**

**Title 22 §66265.52(e) (article 3) states that**



(40 CFR §265.52(e))

the contingency plan shall include a list of all emergency equipment, including each device's location.

The facility's contingency plan lacked this information.

This potential violation has since been corrected.

## **Training Records**

Title 22 §66265.16(c)  
(40 CFR §265.16(c))

Title 22 §66265.16(d)(1)-(4) requires that a generator maintain the following training records:

- (1) the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
- (2) a written job description for each position listed;
- (3) a written description of the type and amount of both introductory and continuing training that will be given to each person listed above;
- (4) records that document that the training or job experience required have been completed.

The facility did not have these records.

This potential violation has since been corrected.

## **POTENTIAL NON-RCRA VIOLATIONS**

**"Used Oil" label**

CCR Title 22 §66279.21(b)

Containers and aboveground tanks used to store used oil shall be marked or clearly labeled with the words "USED OIL".

The following used oil containers were not

marked with the words “USED OIL”:

- Machine Shop: one 55-gallon drum;
- Vehicular Maintenance Area: one 250-gallon tank;
- Wastewater Treatment Area: one 6000-gallon tank;
- Wastewater Storage Area: nineteen 55-gallon drums.

These potential violations have since been documented as corrected.

#### **Lack of aisle space**

##### **CCR Title 22 §66265.35**

**Per Title 22 §66262.34(a)(4), a generator may accumulate hazardous waste on-site for 90 days without a permit provided that the generator complies with the requirements in articles 3 and 4 of chapter 15 and section 66265.16.**

**Title 22 §66265.35 (article 3) states that the owner must maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment.**

The following hazardous waste containers lacked access:

- Machine Shop: one 55-gallon drum of used oil lacked access.

This potential violation has since been documented as corrected.

#### **Tank inspections**

##### **CCR Title 22 §66265.195**

**Title 22 §66262.34(a) states that a generator may accumulate hazardous waste on-site without a permit provided that the generator complies with applicable requirements of article 10 of chapter 15.**

**Title 22 §66265.195 (article 10) states that the facility owner must inspect hazardous waste tanks daily.**

Daily inspections were not performed for the used oil tank in the Vehicular Maintenance Area.

This potential violation has since been documented as corrected.

## **Universal Wastes**

### **- Universal Waste lamps in closed containers**

#### **Title 22 §66273.13(c)(1)**

**A small quantity handler of universal waste shall contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers shall remain closed.**

- In the 90-day storage area the following was noted:

- Two boxes of spent 8' fluorescent tubes, split open;
- Three boxes of spent 4' fluorescent tubes, split open;
- Four unboxed bundles of 8' fluorescent tubes.

These potential violations have since been documented as corrected.

### **- Labeling Universal Waste lamps**

#### **Title 22 §66273.14(c)**

**A small quantity handler of universal waste shall label or mark the universal waste to identify the type of universal waste. Each container in which lamps are contained shall be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)", or "Waste**

**Lamp(s)", or "Used Lamp(s)."**

- In the 90-day storage area the following Universal Waste lamps were unlabeled:

- Two boxes of spent 8' fluorescent tubes;
- Three boxes of spent 4' fluorescent tubes;
- Four unboxed bundles of 8' fluorescent tubes;
- One box of sodium vapor lamps.

These potential violations have since been documented as corrected.

**- Labeling Universal Waste batteries**

**Title 22 §66273.14(a)**

**Universal waste batteries, or a container in which the batteries are contained, shall be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)".**

- Vehicular maintenance area: nine nickel-cadmium batteries were not labeled as required;
- Waste storage area: three boxes of nickel cadmium batteries and one cart of batteries were not labeled as required.

These potential violations have since been documented as corrected.

cadmium batteries were not labeled as required;

- Waste storage area: three boxes of nickel cadmium batteries and one cart of batteries were not labeled as required.

These potential violations have since been documented as corrected.



Hugo Bermudez  
<hbermude@nassco.com>  
11/28/2005 11:04 AM

To: Clint Seiter/R9/USEPA/US@EPA  
cc  
bcc  
Subject: RE: NASSCO Inspection November 16, 2005

Here is additional email.

Hugo

-----Original Message-----

**From:** Hugo Bermudez [mailto:hbermude@nassco.com]  
**Sent:** Monday, November 28, 2005 11:04 AM  
**To:** 'seiter.clint@epa.gov'  
**Subject:** NASSCO Inspection November 16, 2005

Mr. Clinton Seiter:

The Environmental Engineering Department documented the items or compliance concerns during the inspection of November 16, 2005 and issued ECAR's (Environmental Corrective Action Requests) to the responsible departments.

The items are handled through NASSCO's Environmental Management System (EMS) Corrective Action Request (ECAR) program which initiates an investigation, corrective action and review of the compliance by NASSCO's Compliance Assurance Committee (CAC). The CAC is composed of 6 top management officials from different departments to review and recommend additional corrective and preventative actions.

I have attached the ECAR's (PDF's) which include a summary, corrective or planned action(s), before and after pictures to demonstrate actions taken for each item. Please note the ECAR's may or may not currently have a response or cause entered as they have 10 days to response and investigate. The completed ECAR's will be provided to you as soon as they become available.

There are additional emails following this as I could not get all in one email due to size.

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



EC ECAR 041.pdf



## Environmental Corrective Action Request (ECAR)

EC-2005-041

ISSUED DATE: 11/17/2005

Issued To: Warehouse (55)

Reported By: John Martin

Robert Trick  
Manager, Steel Production Control  
Phone: (619) 544-7588  
Mailstop: 37

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-041, to ensure that you meet the required deadline. Please reference EC-2005-041 on any attachments that are submitted.

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Haz-Mat Department. The following items were identified as non-compliance that need corrective action:

1. Waste Ni Cad batteries were not in proper storage container and had no Universal Waste labels on containers
2. Waste fluorescent tubes were not in proper storage containers and had no Universal Waste labels
3. Tri-Sodium Phosphate waste containers had HW label with end accumulation date over 90 day storage period.
4. Dave Power's employee job description does not provide haz-mat responsibilities
5. Drum storage area does not have the proper aisle space

### Regulatory and/or EMS Reference:

### Corrective Action Response:

Items 1-3

Universal waste containers for the batteries and tubes were delivered to Ashland for complete disposal by 12/08/05.

Ashland provided a profile for the TSP. Waste was disposed of on 11/28/05.

Min-Max for universal waste containers and labels to be established. ECD 11/30/05.

Dave Power was instructed to report hazmat exceptions to management and be reviewed weekly at the steel yard white board. Completed 11/28/05.

Item 4

see attached Warehouseman job description and training log.

Item 5

Drums congesting the area were dumped per procedure as of 11/28/05 allowing complete access to all drums. Drum processing recommended to occur weekly instead of every three weeks. ECD 12/01/05.



## Environmental Corrective Action Request (ECAR)

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/s/ Robert Trick on 11/29/2005



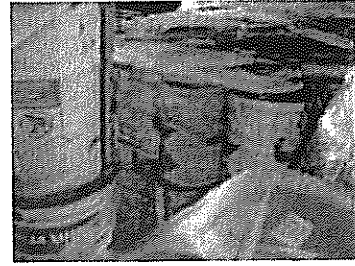
Before pictures



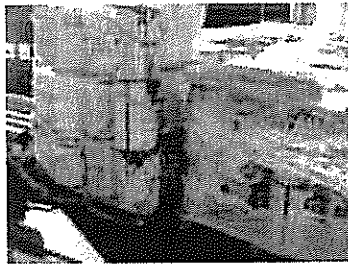
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PICT0068.JPG  
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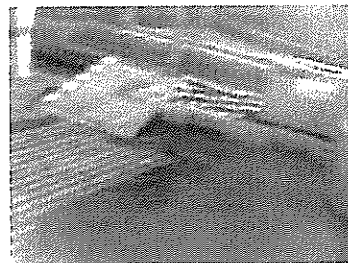
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PICT0072.JPG  
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PICT0073.JPG  
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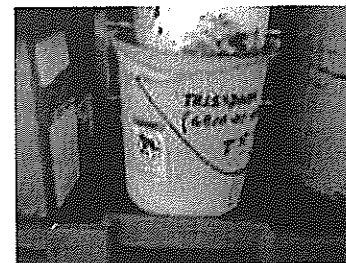
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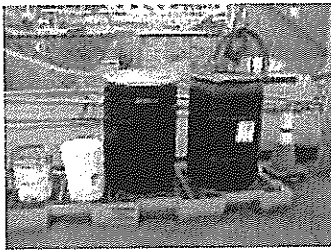
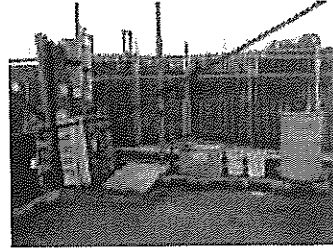
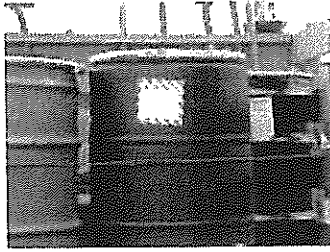
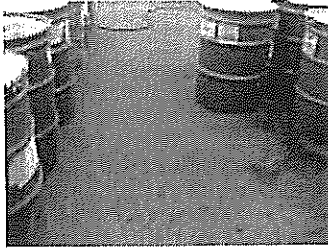


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2048x1536x24b.jpg



PICT0077.JPG  
2048x1536x24b.jpg

After Pictures: The following items have been addressed: Hazwaste drums have been moved and now have proper aisle spacing, NiCad batteries and fluorescent tubes have been placed in proper containers and labeled as universal waste, Tri-Sodium waste have been properly labeled and scheduled for pick up on November 30, 2005, Dave Power job description and training has been provide below.



To: Mike Chow Fax 1088  
From: Bob Trick x-7588  
2 pages

November 24, 1992

### WAREHOUSEMAN

Job descriptions for Dave Power of the Hazmat Department including ongoing training classes.

In order for a Journeyman Warehouseman to obtain a rating of "2" for ability, he/she must possess the following basic abilities. Anything less will be classified as a "1".

### BASIC ABILITIES

1. Successfully pass the NASSCO Journeyman Forklift Operators examination. Be able to operate three of the following industrial fork truck types:
  - Gasoline/diesel powered yard truck.
  - Propane/Electric powered Receiving dock truck.
  - Electric Warehouse Stacker/Reach truck.
  - Electric OrderPicker or Narrow Aisle (Man-up) trucks.
2. Read, write and understand English. Must have legible hand writing.
3. General math skills (addition, subtraction, multiplication and division).
4. Basic understanding of NASSCO's computerized Materials and Inventory Systems.
5. Unpack and inventory inbound material, match to packing slips, freight bills and other documentation.
6. Determine proper storage locations, store material and update the computer system.
7. Maintain quantity and location accuracy of NASSCO owned and Contract owned inventory.
8. Pick and process material issues using manually written and computer generated documents.
9. Able to repetitively lift 50 pounds.

### ADDITIONAL ABILITIES

In order for a Warehouseman to obtain a rating of "3" for ability, he/she must have all of the basic abilities, plus ALL of the additional abilities listed below.

1. Prepare appropriate documents (i.e. Transportation/Damage Report (TDR), Over/Short & Damaged reports (OS&D), Material Return Adjustment (MRA), etc.)

2. Interaction with vendors, purchasing, material control, and production customers; both written and verbal.
3. Recommend adjustments to stock levels, reorder points, and order quantities.
4. Solve difficulties such as issue quantity discrepancies, marking/tagging errors, transportation/delivery errors, location/quantity discrepancies.
5. Understand and effectively use advanced Materials/Inventory and Planning/Production computer systems to organize work and research material demands.
6. Expertise in unique processes and procedures for at least 8 of the following material types:
  - N/C Schedule A GFM or owner furnished
  - N/C Material Order Schedule (MOS)
  - N/C Fabrication Order Schedule (FOS)
  - N/C Steel and Pipe
  - N/C Spares/Fitting out materials
  - N/C Electrical Cable
  - N/C Non-spec material
  - NASSCO owned Min-Max and Surplus Inventories
  - Ship Repair GFM
  - Ship Repair, CF material
  - Maintenance, Repair and Operating Materials
  - NASSCO Archives
  - Hazardous Materials (HAZMAT)
7. Must have significant cross-trade abilities as a Tool Room Attendant, Material Chaser, or pass the journeyman's test to operate an overhead, tower, or portal crane.
8. Understands common material identification codes, symbols, grades, and sizes. Able to employ basic material inspection techniques with this knowledge.
9. Able to operate all warehousing forklift trucks listed in the basic requirements.

A Warehouseman may be classified a "3" by also knowing ALL of the basic requirements, plus have passed the basic journeyman assessment test of another major trade, listed below:

- |                     |               |
|---------------------|---------------|
| - Inside Machinist  | - Electrician |
| - Outside Machinist | - Sheet Metal |
| - Welder            | - Shipfitter  |
| - Pipefitter        |               |

A Warehouseman may be classified a "4" by obtaining required abilities to qualify him/her as a "3" plus pass a basic journeyman assessment test of another major trade as listed above.

**Hugo Bermudez**

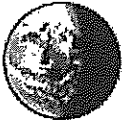
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**From:** Chad Haza [chaza@nassco.com]  
**Sent:** Tuesday, November 22, 2005 9:10 AM  
**To:** 'Hugo Bermudez'  
**Subject:** D. Powers | NASSCO Training  
 Dave Power 50698

Course	Completion	Session
ENV-10: HazMat Coordinator Training Refresher 2005	06/22/2005	C
RCRA/DOT Training, 40 CFR 262.34 & 49 CFR 172.700: 2005	06/23/2005	A
ENV-10: HazMat Coordinator Training Refresher 2004	04/21/2004	C
ENV-10: HazMat Coordinator Training Refresher 2003	05/13/2003	C
ENV-01: HazMat Coordinator Training 2002	07/31/2002	E
2005 SPCC Briefing 40 CFR Part 112	09/29/2005	A

**Chad Haza**  
*Environmental Administrator*  
 National Steel and Shipbuilding Company  
**T 619.544.8826**  
**F 619.744.1088**  
<mailto:chaza@nassco.com>

11/28/2005



Hugo Bermudez  
<hbermude@nassco.com>  
11/28/2005 11:03 AM

To Clint Seiter/R9/USEPA/US@EPA  
cc  
bcc  
Subject NASSCO Inspection November 16, 2005

Mr. Clinton Seiter:

The Environmental Engineering Department documented the items or compliance concerns during the inspection of November 16, 2005 and issued ECAR's (Environmental Corrective Action Requests) to the responsible departments.

The items are handled through NASSCO's Environmental Management System (EMS) Corrective Action Request (ECAR) program which initiates an investigation, corrective action and review of the compliance by NASSCO's Compliance Assurance Committee (CAC). The CAC is composed of 6 top management officials from different departments to review and recommend additional corrective and preventative actions.

I have attached the ECAR's (PDF's) which include a summary, corrective or planned action(s), before and after pictures to demonstrate actions taken for each item. Please note the ECAR's may or may not currently have a response or cause entered as they have 10 days to response and investigate. The completed ECAR's will be provided to you as soon as they become available.

There are additional emails following this as I could not get all in one email due to size.

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



EC ECAR 037.pdf EC ECAR 038.pdf EC ECAR 043.pdf EC ECAR 044.pdf EC ECAR 045.pdf



## Environmental Corrective Action Request (ECAR)

EC-2005-037

ISSUED DATE: 11/17/2005

Issued To: Machining Division (3)

Randy Hurless

Phone: (619) 544-8434

Mailstop: 15

Reported By: John Martin

Environmental Engineering

Phone: (619) 544-3553

Fax: (619) 744-1088

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-037, to ensure that you meet the required deadline. Please reference EC-2005-037 on any attachments that are submitted.

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Machine Shop. The following items were noted that need corrective action:

1. Proper aisle space between HW drums to allow for proper drum inspection to check for any leaks, proper labeling or damage to the drums.

2. Photographic negatives need hazardous waste container with a lid. The container needs a hazardous waste label or label with the words hazardous waste and empty daily.

### Regulatory and/or EMS Reference:

### Corrective Action Response:

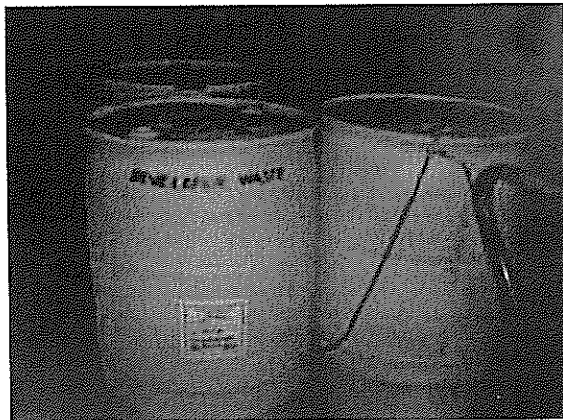
1b) Secondary containment (drums) will be moved to allow proper spacing and access to drums for inspections - COMPLETE

1b) Drums containing new and waste materials will be separated from each other - COMPLETE

2) Photographic spent film will be handled in a flip top 10 gallon container and properly labeled "hazardous waste" to identify the contents. The container will be emptied daily - ECD 11/29/05

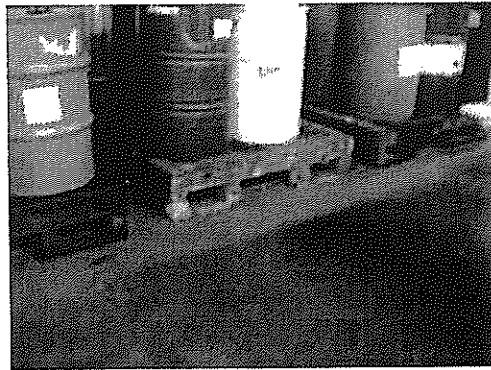
/s/ John Walden 11/22/2005

Before pictures: New containers for spent film have been ordered with lid and will be utilized.





After pictures: The hazardous waste drums have been move to provide proper aisle spacing for drums inspections. New and waste material has been separated.





## D&D TOOL & SUPPLY

Corporate Office: 1028 Buenos Ave ■ San Diego, CA 92110  
Phone 619-276-9100 ■ Fax 619-276-9108  
[www.ddtool.com](http://www.ddtool.com)

After: Purchase requisition for spent film containers.

### CUSTOMER / SUPPLIER Fax Cover Sheet

Contact us:

**Purchasing Fax: (619)398-8355**

E-mail: [purchasing@ddtool.com](mailto:purchasing@ddtool.com)

**A/R Fax: (619)398-1910**

A/R E-mail: [ar@ddtool.com](mailto:ar@ddtool.com)

**Sales Fax: (619)276-9199**

Sales E-mail: [expert@ddtool.com](mailto:expert@ddtool.com)

*Suppliers Please Ship To:*

**D&D TOOL & SUPPLY – Br# 01**  
1028 Buenos Ave  
San Diego, CA 92110

\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*

To : JOHN WALDEN

Fax# : 1-619-544-7901

From : STEVE FOX

Co. Name : NASSCO/P CARD

Message :

JOHN BOTH ITEMS IN STOCK L A THEY WILL BE HERE MONDAY !!!

\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*

\*\* ACKNOWLEDGEMENT \*\*

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 SAN DIEGO CA 92110  
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Order #: S1453839  
 Rel# :  
 Printed: 09:45:59 23 NOV 2005  
 Page # : 1 of 1

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 HARBOR DR & 28TH  
 SAN DIEGO, CA 92113

Ship To:  
 NASSCO/P CARD  
 HARBOR DR & 28TH  
 SAN DIEGO, CA 92113

619-544-8529

Ordered by	Order Date	Ship Date	Ship Via	Warehouse
JOHN WALDEN	11/23/05	11/25/05	VANCE O. BR01	Shp 1 Prc 1

Writer	Salesperson	Customer PO#	Freight Allowed
STEVE FOX	Vance Oesterling	CC/ JOHN WALDEN	No

Ln#	Ordered	Product Description	Unit Price	Net
1	4ea	WAS 955056 6 GALLON POLY OILY WASTE CAN W/FT LVR *****	50.500	202.00
2	1ea	WAS 955196 10X9 FUNNEL W/6 FLAME ARRESTR JUSTRITE *****	180.000	180.00

SUBTOTAL	382.00
----------	--------

Total Amount	382.00
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.. Reprint .. Reprint .. Reprint .. Reprint ..



## Environmental Corrective Action Request (ECAR)

---

EC-2005-038

ISSUED DATE: 11/17/2005

Issued To: Quality Assurance (80)

Keith Londot  
Manager, Quality Assurance  
Phone: (619) 544-8802  
Mailstop: 10

Reported By: John Martin

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

---

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-038, to ensure that you meet the required deadline. Please reference EC-2005-038 on any attachments that are submitted.

---

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of NDT. The following items of non-compliance were noted that need corrective action:

1. Waste photographic chemicals need hazardous waste accumulation labels affixed to all storage containers.
2. Any waste photographic negatives will be placed in a container with a lid and have a hazardous waste label or a label with hazardous waste statement and empty daily wording will be attached to the container.

### Regulatory and/or EMS Reference:

### Corrective Action Response:

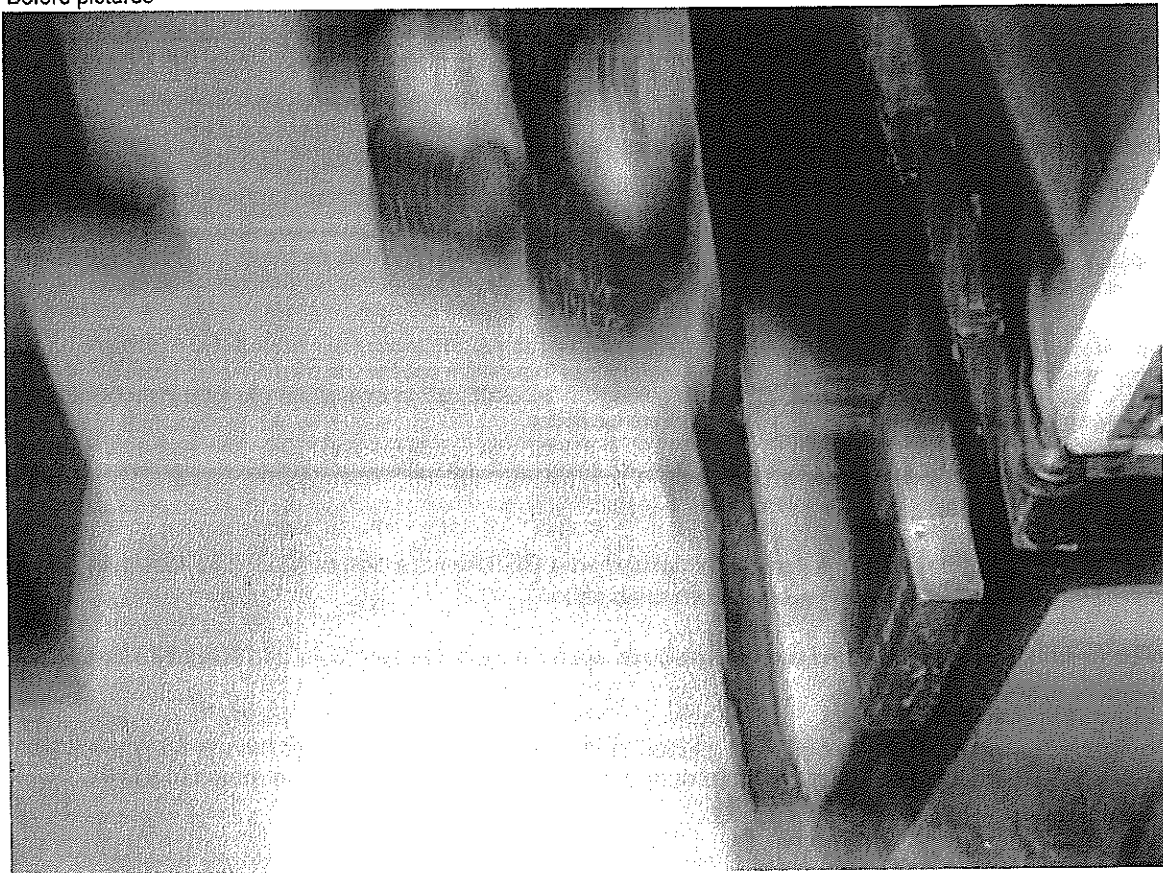
NDT Inspection Lab was generally unaware of the labeling requirements for spent film and developing chemicals.

Corrective actions have been accomplished on items 1 and 2:

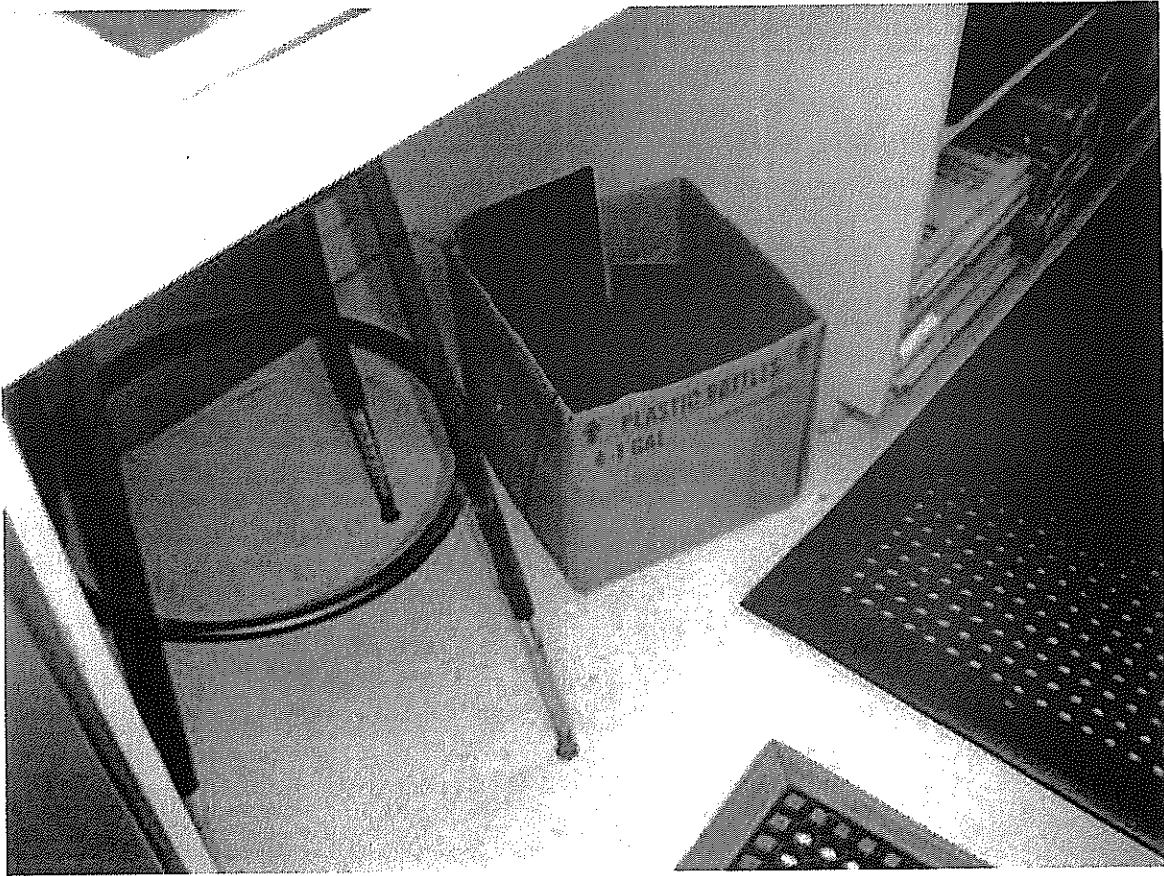
- 1) A container will be purchased and marked "Waste Radiographic Film" and "Empty Daily."
- 2) Containers for waste photographic fixer and waste photographic developer have been properly labeled with an approved hazmat label and marked "Empty Daily". Containers were also placed in secondary containment.

/s/ Bill Huston on 11/23/2005

Before pictures



After pictures: New containers for spent film have been ordered with lids and will be utilized.



After pictures: The spent fixer and developer chemicals have been properly labeled and secondary containment applied to prevent accidental spillage.





## D&D TOOL & SUPPLY

Corporate Office: 1028 Buenos Ave # San Diego, CA 92110  
Phone 619-276-9100 • Fax 619-276-9108  
[www.ddtool.com](http://www.ddtool.com)

After: Purchase requisition for spent film containers.

### CUSTOMER / SUPPLIER Fax Cover Sheet

Contact us:

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E-mail: [purchasing@ddtool.com](mailto:purchasing@ddtool.com)

**A/R Fax: (619)398-1910**

A/R E-mail: [ar@ddtool.com](mailto:ar@ddtool.com)

**Sales Fax: (619)276-9199**

Sales E-mail: [expert@ddtool.com](mailto:expert@ddtool.com)

*Suppliers Please Ship To:*

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1028 Buenos Ave  
San Diego, CA 92110

\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*

To : JOHN WALDEN

Fax# : 1-619-544-7901

From : STEVE FOX

Co. Name : NASSCO/P CARD

Message :

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\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*



\*\* ACKNOWLEDGEMENT \*\*

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 HARBOR DR & 28TH  
 SAN DIEGO, CA 92113

619-544-8529

Ordered by JOHN WALDEN	Order Date 11/23/05	Ship Date 11/25/05	Ship Via VANCE O. BR01	Warehouse Shp 1	Prc 1
Writer STEVE FOX	Salesperson Vance Oesterling		Customer PO# CC/ JOHN WALDEN	Freight Allowed No	
Ln#	Ordered	Product Description		Unit Price	Net
1	4ea	WAS 955056 6 GALLON POLY OILY WASTE CAN W/FT LVR *****		50.500	202.00
2	1ea	WAS 955196 10X9 FUNNEL W/6 FLAME ARRESTR JUSTRITE *****		180.000	180.00
SUBTOTAL				-----	382.00
Total Amount				-----	382.00

.. Reprint .. Reprint .. Reprint .. Reprint ..



## Environmental Corrective Action Request (ECAR)

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EC-2005-043

ISSUED DATE: 11/17/2005

Issued To: Corporate Relations (94)

Reported By: John Martin

Jan Camahan  
Marketing and Graphics Assistant  
Phone: (619) 544-8825  
Mailstop: 211

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

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Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-043, to ensure that you meet the required deadline. Please reference EC-2005-043 on any attachments that are submitted.

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### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Photographic Department lab in Building 8. The following non-compliance item was noted that need corrective action:

1. The HW label on the Silver recovery waste container was over the one year storage period for replacement.

### Regulatory and/or EMS Reference:

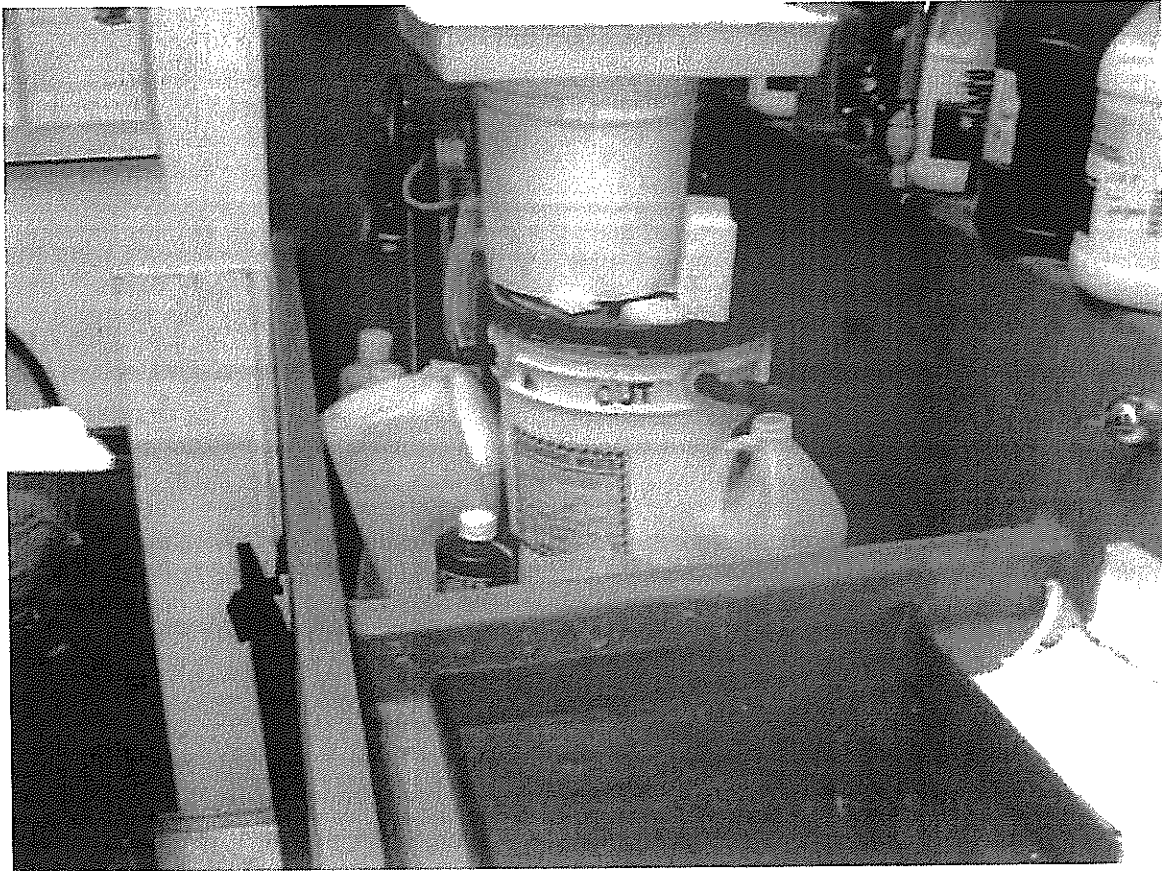
### Corrective Action Response:

Open requisition for service of three 5-gallon conisters for silver recovery systems. May X-Ray will be subcontracted for this service.

/s/ John Walden on 11/22/05.

Before pictures

pic0050.jpg (2048x1536x24b.jpg)





NATIONAL STEEL AND SHIPBUILDING COMPANY

## MACHINE SHOP PURCHASE REQUISITION

## RECOMMENDED VENDOR:

MERRY X-RAY CHEMICAL CORP.

858-565-9923

PHONE

858-565-2409 FAX

LINE ITEM	QUANTITY	UNIT	DESCRIPTION	UNIT PRICE	AMOUNT
			PROVIDE SERVICE FOR		
			SILVER RECOVERY SYSTEMS		
	3		5 GAL. CANISTER SYSTEM	EA 130. <sup>00</sup>	
				X 3	
			SERVICE CHARGE 75. <sup>00</sup> EA		= 390. <sup>00</sup>
			1 EA METAL PHOTO SHOP	BLA. 8	EA 75. <sup>00</sup>
				X 3	
					= 225. <sup>00</sup>
			1 EA PLANT PHOTOGRAPHER		
			DARK ROOM BLA 8		
				TOTAL	615. <sup>00</sup>
			1 EA N.D.T. (NON DESTRUCTIVE		
			TESTING) DARK ROOM	BLA. 8	

REQUISITION NUMBER

PURCHASE ORDER NUMBER

DELIVERY LOCATION

NA-308

DATE REQUIRED

ASAP

END USE

REQUISITION DATE

EXTENSION

SIGNATURE

AUTHORIZED BY

WORK ORDER / %

CALL JOE # 8433

30 NOVEMBER



## Environmental Corrective Action Request (ECAR)

EC-2005-044

ISSUED DATE: 11/17/2005

Issued To: Blast & Paint (16)

Reported By: John Martin

Judie Blakey  
Superintendent, Production  
Phone: (619) 544-8443  
Mailstop: 02

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-044, to ensure that you meet the required deadline. Please reference EC-2005-044 on any attachments that are submitted.

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Small Parts Painting area - Paint Storage. The following item of non-compliance were noted that need corrective action:

1. A number of one gallon paint containers has no expiration dates on the paint containers.
2. One 5 gallon paint can had a expiration date August 2005 with no decision made as to the disposal or recycling of the paint container

### Regulatory and/or EMS Reference:

### Corrective Action Response:

The department was unaware of the regulation 40 CFR 262.11 about expired paint. There is no statement in the ISO 14001 reference guide.

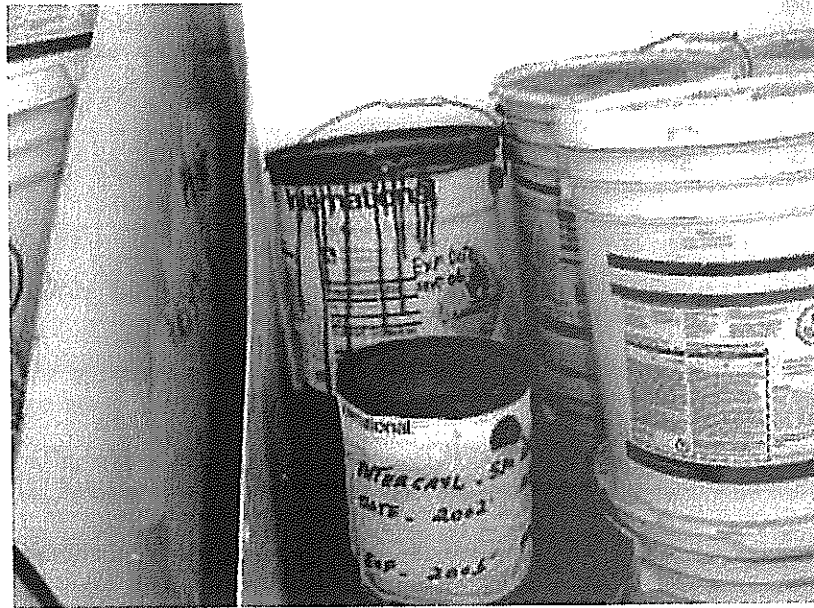
Hugo Bermudez, Environmental Engineer provide the department with the 40 CFR 626.11 regulation to reference the expired paint. The discrepant paint was sent to hazardous waste for disposal.

Our department policy has been to send any expired paint back to the main paint storage site for disposition.

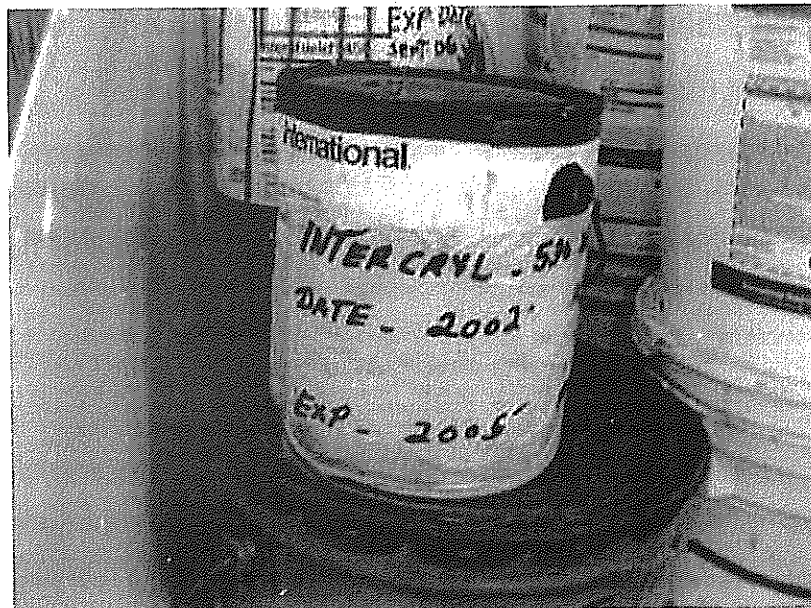
All department supervision will be informed at the weekly staff meeting (next meeting 11/28/05) and there will be a handout for them to present the information to their crews in their 5-minute morning meeting.

/s/ Juan Saludes on 11/22/2005

Before pictures: The paint had an expiration date of August 2005 (still within the 90 days), paint will be disposed before the 90 days. Manifest for the spent paint will be provided as soon as it becomes available.



PICT0086.JPG  
2048x1536x24bpp



PICT0087.JPG  
2048x1536x24bpp



## Environmental Corrective Action Request (ECAR)

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EC-2005-045

ISSUED DATE: 11/17/2005

Issued To: Blast & Paint (16)

Judie Blakey  
Superintendent, Production  
Phone: (619) 544-8443  
Mailstop: 02

Reported By: John Martin

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

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Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-045, to ensure that you meet the required deadline. Please reference EC-2005-045 on any attachments that are submitted.

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### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Wheelabrator area. The following item of non-compliance were noted that need corrective action:

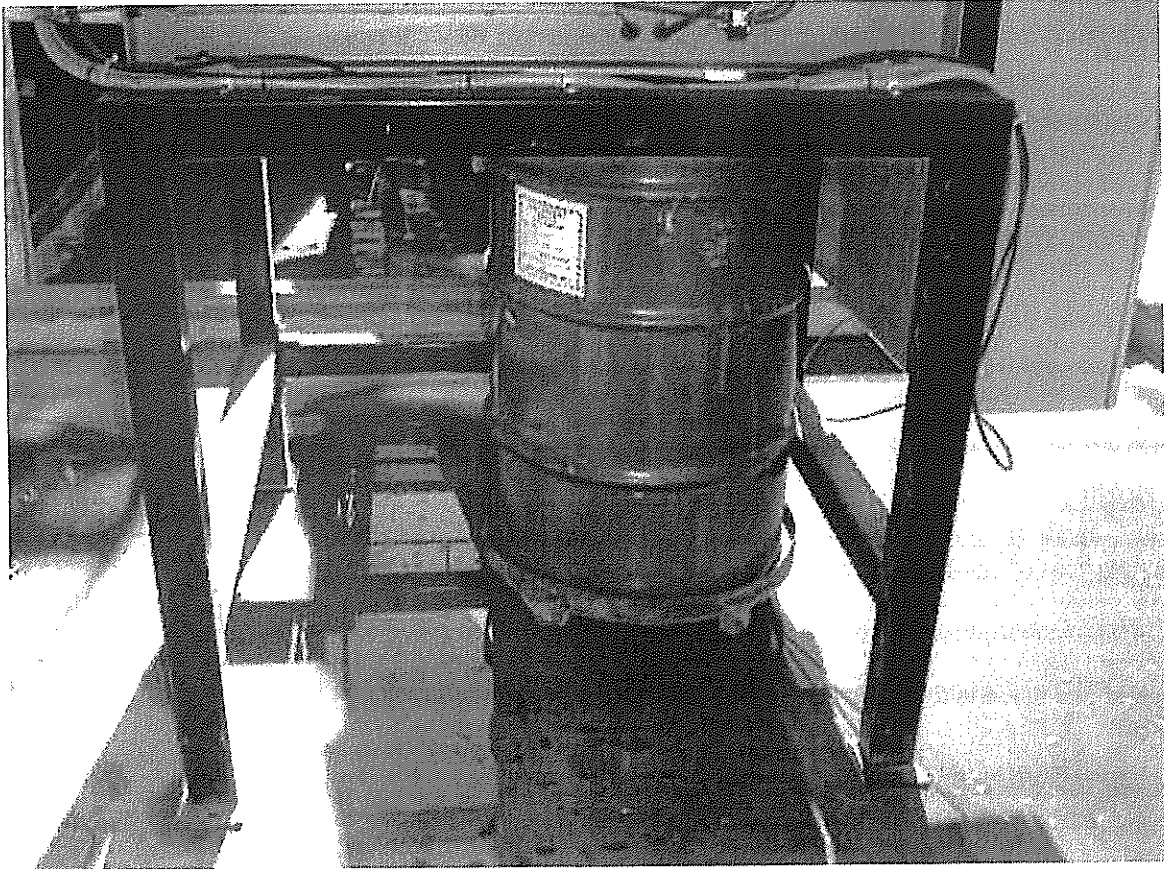
1. The paint water curtain sludge collection tank need a cover to prevent spillage.
2. Two HW paint sludge drums were identified in the same satellite accumulation area.

### Regulatory and/or EMS Reference:

### Corrective Action Response:

Before pictures: Drop chute for drum will be manufactured to prevent spillage.

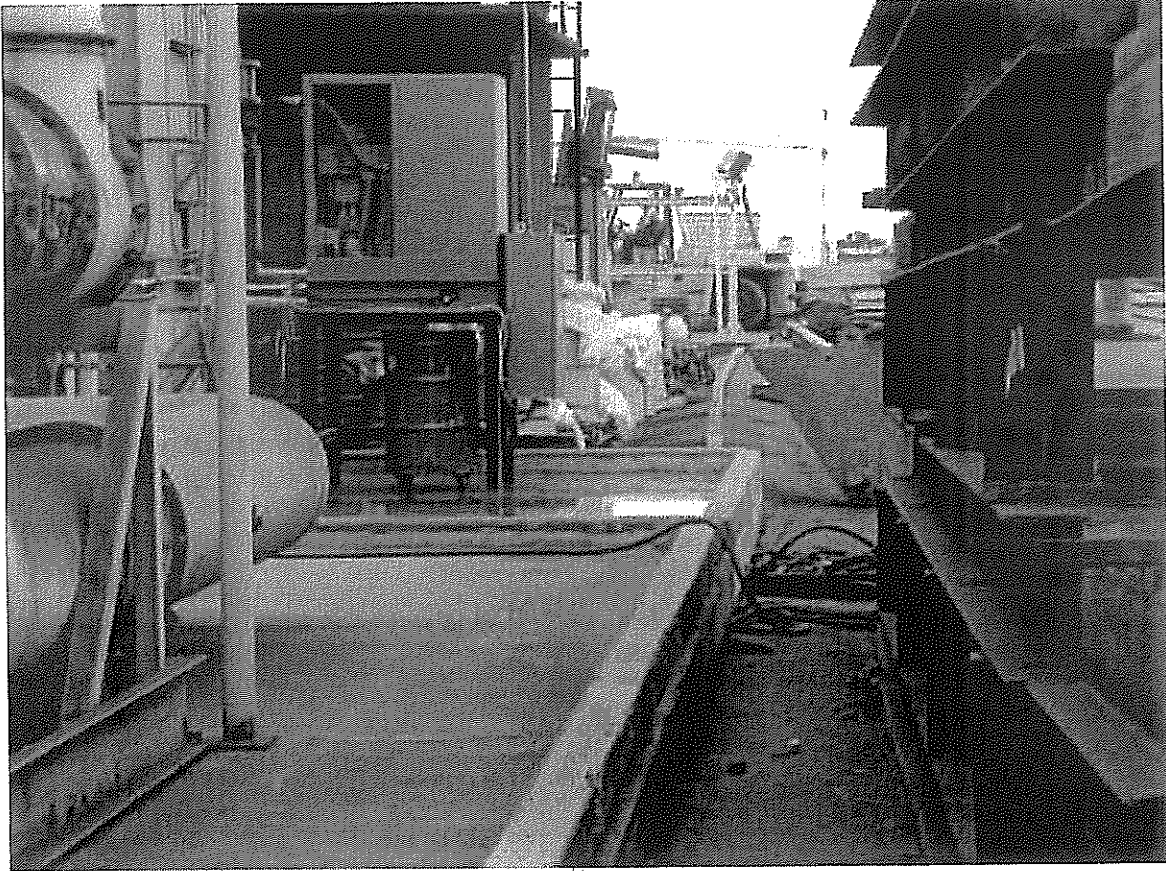
pic0063.jpg (2048x1536x24b.jpg)





After pictures: Hazardous waste paint sludge has been removed from the same satellite accumulation area and a drop chute will be manufactured for the existing drum.

pic0015.jpg (2048x1536x24b.jpg)





Hugo Bermudez  
<hbermude@nassco.com>  
11/28/2005 11:06 AM

To "'Hugo Bermudez'" <hbermude@nassco.com>, Clint  
Seiter/R9/USEPA/US@EPA  
cc  
bcc

Subject RE: NASSCO Inspection November 16, 2005

One more email.

Hugo

-----Original Message-----

**From:** Hugo Bermudez [mailto:hbermude@nassco.com]  
**Sent:** Monday, November 28, 2005 11:05 AM  
**To:** 'seiter.clint@epa.gov'  
**Subject:** RE: NASSCO Inspection November 16, 2005

Here is additional email.

Hugo

-----Original Message-----

**From:** Hugo Bermudez [mailto:hbermude@nassco.com]  
**Sent:** Monday, November 28, 2005 11:04 AM  
**To:** 'seiter.clint@epa.gov'  
**Subject:** NASSCO Inspection November 16, 2005

Mr. Clinton Seiter:

The Environmental Engineering Department documented the items or compliance concerns during the inspection of November 16, 2005 and issued ECAR's (Environmental Corrective Action Requests) to the responsible departments.

The items are handled through NASSCO's Environmental Management System (EMS) Corrective Action Request (ECAR) program which initiates an investigation, corrective action and review of the compliance by NASSCO's Compliance Assurance Committee (CAC). The CAC is composed of 6 top management officials from different departments to review and recommend additional corrective and preventative actions.

I have attached the ECAR's (PDF's) which include a summary, corrective or planned action(s), before and after pictures to demonstrate actions taken for each item. Please note the ECAR's may or may not currently have a response or cause entered as they have 10 days to response and investigate. The completed ECAR's will be provided to you as soon as they become available.

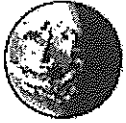
There are additional emails following this as I could not get all in one email due to size.

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 |  
hbermude@nassco.com



EC ECAR 039.pdf



Sshannond@aol.com  
12/02/2005 07:53 PM

To: Shannon Davis/R9/USEPA/US@EPA  
cc  
bcc  
Subject: Fwd: Monday December 5 - Sustainability Task Force Call - Call-in Information

----- Message from "Tom Kennedy" <swmtjk@sso.org> on Tue, 29 Nov 2005 08:48:23 -0500 -----  
"Shepard, Jay" <jshe461@ecy.wa.gov>, "Stan Phillippe" <SPhillip@dtsc.ca.gov>,  
To: <Jennifer\_Kaduck@dnr.state.ga.us>, <paleonar@gw.dec.state.ny.us>,  
<sxhammon@gw.dec.state.ny.us>, <swmkerry@sso.org>, <sshannond@aol.com>  
cc: "Sharon Qualley" <SQualley@dtsc.ca.gov>, <swmbarb@sso.org>, "Tom Kennedy"  
<swmtjk@sso.org>

Subj RE: Monday December 5 - Sustainability Task Force Call - Call-in Information  
ect:

We have arranged a call-in number for your use in participating in this December 5, 2005 ASTSWMO conference call. Please note this is a little different in that it's an "unattended" call. At 3:00 pm Eastern Standard Time (2:00 pm, Central, 1:00 pm Mountain; 12:00 noon Pacific) please dial into the following NEW number, 1-800-423-1988 and follow the prompts. When asked for your participant pass code number, enter 818174. I believe the prompt may ask that you add a # symbol too, but in any case follow the prompt. If you should get caught in a loop, and go to the operator assistance option instead, the call's moderator is Jay Shepard, and the conference ID number is 818174. Tkx, Tom

-----Original Message-----

From: Shepard, Jay [mailto:jshe461@ecy.wa.gov]  
Sent: Monday, November 28, 2005 6:18 PM  
To: Stan Phillippe; Davis.Shannon@azdeq.gov;  
Jennifer\_Kaduck@dnr.state.ga.us; paleonar@gw.dec.state.ny.us;  
sxhammon@gw.dec.state.ny.us; swmkerry@sso.org  
Cc: Sharon Qualley; swmbarb@sso.org; swmtjk@sso.org; sshannond@aol.com  
Subject: Monday December 5 - Sustainability Task Force Call

Hello Sustainability Task Force Members

Let's plan on meeting via conference call on December 5, from 3 to 4 EST, 12 to 1 PST. Call in information will be sent under a separate e-mail from ASTSWMO.

Agenda items:

- Next steps - board direction and detailed work plan (see e-mail excerpt from Terry Gray, below).
- Roll out and use of our products - the two pager and the examples paper.
- Development of a PowerPoint presentation on sustainability that can be used by ASTSWMO members.
- Establishing a "networking backbone" using information technology.
- Product Stewardship Proposal - Collaborating with ISRI on automobiles.
- Task Force membership.
- Set meeting dates through mid-January if possible.

FYI - I receive the following in an e-mail from ASTSWMO President Terry Gray. We've got some work to do to prepare for the upcoming board meeting in January.

"...this group is at a critical point in its' development within ASTSWMO. The Board adopted the policy paper that the group developed at our last meeting. I think there is a general feeling of anxiousness now to move beyond the concept and develop and implement an action plan to show our members what great work is ongoing and show them how they can take the lessons learned back home to their own programs. To me, facilitating transferability of these experiences is a critical function for our organization.

"The bulk of the January Board meeting will be to put some action items and plans behind all the concepts adopted in the ASTSWMO strategic plan, including sustainability as a huge priority area. It would be very, very beneficial to have an informed discussion with the Board if you could get the sustainability group together and develop some preliminary short-term and longer term action plans. It's not critical to get it exactly perfect, but I think it is critical to keep the momentum going and start working on some clearly defined tasks."



## Environmental Corrective Action Request (ECAR)

EC-2005-039

ISSUED DATE: 11/17/2005

Issued To: Maintenance (62)

Reported By: John Martin

Mark Kukuchek  
Director T&T, Maint., Facilities  
Phone: (619) 544-8799  
Mailstop: 38-A

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-039, to ensure that you meet the required deadline. Please reference EC-2005-039 on any attachments that are submitted.

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Maintenance area. The following items of non compliance were noted that need corrective action:

1. Large yellow used oil tank needs a daily inspection log to identify any leaks or waste in secondary containment area.
2. NiCad batteries were identified with lead acid batteries in the Maintenance battery storage area. NiCad batteries are required to be managed as Universal Waste. Batteries require a covered container for storage and a Universal Waste label.

### Regulatory and/or EMS Reference:

### Corrective Action Response:

BMP 111 "Universal Waste" does not cover proper separation of batteries, Ni Cads and Lead Acid.

Item 1) Set up daily log thru 12/31/06, also added tank check to maintenance daily housekeeping walkthroughs.

Item 2) Correctly sorted batteries, disposed of Ni Cads batteries as universal waste, also set up covered plastic waste drum as "Universal Waste" for future NiCad battery disposal.

Set up training for supervision to better identify hazmat and handling.

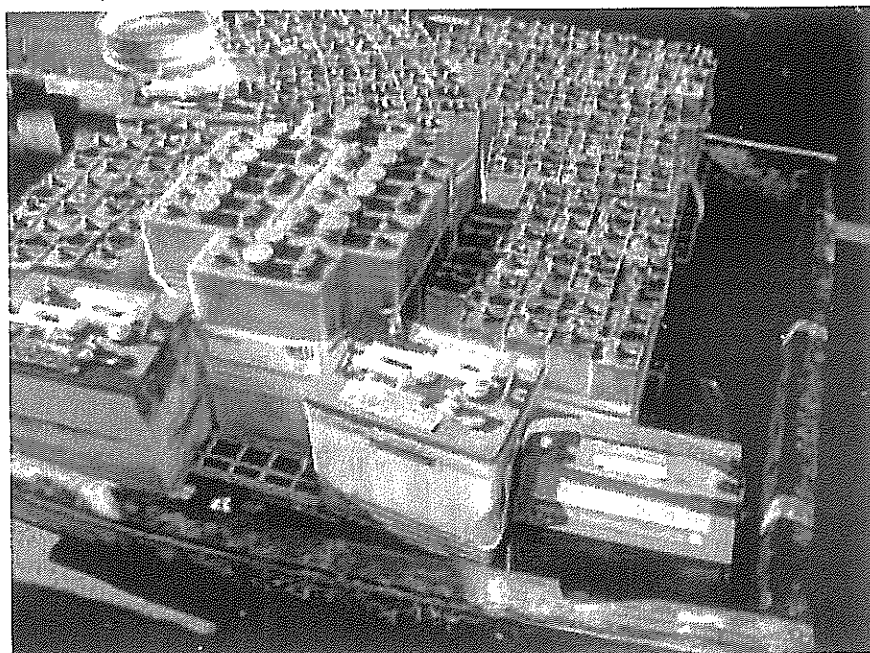
/s/ Carl Whitaker on 11/22/2005

Before Pictures: A new tank inspection checklist has been generated and implemented for the oil tank.



PICT0063.JPG  
2018x1536x24b jpeg

Action in process:



PICT0064.JPG  
2048x1536x24b jpeg

Daily checklist for the yellow oil tank (one week) and new form (below) as started on November 21, 2005

# Housekeeping Checklist

Location <i>Maintenance</i>	Inspected by <i>Tamara G.</i>	Badge # <i>43056</i>	Shift <i>1</i>	Inspection Date <i>10-14-15</i>
--------------------------------	----------------------------------	-------------------------	-------------------	------------------------------------

OK	Not OK	NA	Housekeeping Item Description	Corrective Measure	Assigned To	Date Completed
			<b>Area Hazards</b>			
			- Crane rails are free of grease			
			- Lines, leads, and hoses are properly routed and organized			
			- Standing water is removed from the work area			
			<b>Area Access</b>			
			- Designated walkways are clear and unobstructed			
			- Fire lanes are clear and unobstructed			
			- Access ladders are cleared at both top & bottom			
			- Storm drains are clear and unobstructed			
			<b>Material Storage</b>			
			- Material and equipment are stored and organized <i>1st Shop Needs Organizing</i>		<i>Tamara</i>	
			- Bins, shelves & cabinets are not overloaded			
			- Obsolete fixtures, tools & materials are sent to reclamation <i>Back behind Bldg 26</i>		<i>Bill</i>	
			- Other: Properly stored and organized issues <i>need cleaning</i>			
			- <i>Main 7 Receiving has same material for several days</i>		<i>Tamara</i>	
			<b>General Clean Up</b>			
			- Work areas, roadway & walkways, are swept up and clean			
			- All debris, trash, paper, cans, wood, & dirt are cleaned up <i>Behind Oil Wash Basin Area</i>		<i>Tamara</i>	
			- All trash collection containers are less than 3/4 full <i>needs clean up</i>		<i>Tamara</i>	
			- All skip tubs are emptied as required			
			<b>Equipment Maintenance</b>			
			- Machinery is clean, leak free, and in safe working condition <i>Flare Thru deck needs cleaning @ Bldg 12</i>		<i>Tamara</i>	
			- Areas around machinery is free of debris and clear access			
			- All electrical covers are in place			
			- Transportation equipment is leak free			
			<b>Hazardous waste and materials</b>			
			- Recyclable material is properly separated.			
			- Hazardous waste is separated from general trash			
			- Secondary containment are free from liquids and rain water			
			- <i>For Fuel Tank has Oxy in 2ndary containment</i>		<i>Tamara</i>	
			<b>Hazardous waste labels</b>			
			- inspect labels for compliance, properly filled out			
			- Labels are legible and easy to read			
			- Labels indicate proper date, name of hazard, etc.			
			- Containers in satellite areas have start date less than 9 months old			
			- Containers in non satellite areas have start date less than 30 days old			
			<b>Spills</b>			
			- Any spill is reported to ext. 8401			
			- No unreported spill is present			
			<b>Other</b>			



# Housekeeping Checklist

Location <i>Maintenance</i>			Inspected by <i>Jaine G</i>		Badge # <i>43056</i>	Shift <i>1</i>	Inspection Date <i>11-15-05</i>
OK	Not OK	NA	Housekeeping Item Description	Corrective Measure	Assigned To	Date Completed	
			<u>Area Hazards</u>				
			- Crane rails are free of grease				
			- Lines, leads, and hoses are properly routed and organized				
			- Standing water is removed from the work area				
			<u>Area Access</u>				
			- Designated walkways are clear and unobstructed				
			- Fire lanes are clear and unobstructed				
			- Access ladders are cleared at both top & bottom				
			- Storm drains are clear and unobstructed				
			<u>Material Storage</u>				
			- Material and equipment are stored and organized - <i>Remove hardware from Pipe Throder - KRIS</i>				
			- Bins, shelves & cabinets are not overloaded				
			- Obsolete fixtures, tools & materials are sent to reclamation - <i>BZB - East - Yard Service</i>		<i>BZZZ</i>		
			- Other: Properly stored and organized issues	<i>Material needs proper storage -</i>			
			<u>General Clean Up</u>				
			- Work areas, roadways & walkways, are swept up and clean				
			- All debris, trash, paper, cans, wood, & dirt are cleaned up				
			- All trash collection containers are less than 3/4 full.				
			- All skip tubs are emptied as required				
			- <i>Bldg 8-East - Old door needs to be thrown away</i>		<i>BZZZ</i>		
			<u>Equipment Maintenance</u>				
			- Machinery is clean, leak free, and in safe working condition - <i>Grinder Box &amp; Steam Pit</i>				
			- Areas around machinery is free of debris and clear access - <i>3 ea grease guns hanging on side</i>		<i>Angel</i>		
			- All electrical covers are in place				
			- Transportation equipment is leak free				
			<u>Hazardous waste and materials</u>				
			- Recyclable material is properly separated.				
			- Hazardous waste is separated from general trash				
			- Secondary containment are free from liquids and rain water				
			<u>Hazardous waste labels</u>				
			- Inspect labels for compliance, properly filled out				
			- Labels are legible and easy to read				
			- Labels indicate proper date, name of hazard, etc.				
			- Containers in satellite areas have start date less than 9 months old				
			- Containers in non satellite areas have start date less than 30 days old				
			<u>Spills</u>				
			- Any spill is reported to ext. 8401				
			- No unreported spill is present				
			<u>Other</u>				
			- <i>B. 82 - North - 2 ea. Fire Extinguishers on Floor</i>		<i>Mags</i>		
			- <i>" Bandsaw / Grinder Next Clean Up</i>		<i>Rags</i>		
			- <i>" Rucks (East) Remove damaged Fixtures</i>		<i>Mags</i>		
			- <i>" Empty Trash in Smoking Area</i>		<i>Mags</i>		

Where do we dispose of contaminated materials such as  
Pyrex, Corvalls, Plastic, wood etc?

# Housekeeping Checklist

Location: Main 1 Inspected by: Jaime G Badge #: 43052 Shift: 1 Inspection Date: 11-16-05

OK	Not OK	NA	Housekeeping Item Description	Corrective Measure	Assigned To	Date Completed
			<u>Area Hazards</u>			
			- Crane rails are free of grease			
			- Lines, leads, and hoses are properly routed and organized			
			- Standing water is removed from the work area			
			<u>Area Access</u>			
			- Designated walkways are clear and unobstructed			
			- Fire lanes are clear and unobstructed <u>See last item</u>			
			- Access ladders are cleared at both top & bottom			
			- Storm drains are clear and unobstructed			
			<u>Material Storage</u>			
			- Material and equipment are stored and organized			
			- Bins, shelves & cabinets are not overloaded - <u>1312 - work bench clutter</u>		<u>Kris</u>	
			- Obsolete fixtures, tools & materials are sent to reclamation			
			- Other: Properly stored and organized issues			
			<u>General Clean Up</u>			
			- Work areas, roadways & walkways, are swept up and clean	<u>Pipe Thru Table needs</u>	<u>Kris</u>	
			- All debris, trash, paper, cans, wood, & dirt are cleaned up	<u>Clean up 1312 NE</u>		
			- All trash collection containers are less than 3/4 full.			
			- All skip tubs are emptied as required			
			<u>Equipment Maintenance</u>			
			- Machinery is clean, leak free, and in safe working condition	<u>Buckin lite B&amp;Z (NE)</u>	<u>Simon</u>	
			- Areas around machinery is free of debris and clear access	<u>B&amp;Z - Buckin lite dirty</u>	<u>Frank</u>	
			- All electrical covers are in place			
			- Transportation equipment is leak free			
			<u>Hazardous waste and materials</u>			
			- Recyclable material is properly separated.	<u>City Reg Drum</u>	<u>not filled</u>	<u>Carl</u>
			- Hazardous waste is separated from general trash			
			- Secondary containment are free from liquids and rain water			
			<u>Hazardous waste labels</u>			
			- Inspect labels for compliance, properly filled out			
			- Labels are legible and easy to read			
			- Labels indicate proper date, name of hazard, etc.			
			- Containers in satellite areas have start date less than 9 months old			
			- Containers in non satellite areas have start date less than 30 days old			
			<u>Spills</u>			
			- Any spill is reported to ext. 8401			
			- No unreported spill is present			
			<u>Other</u>			
			<u>Fire Equipment</u> <u>check hydrant in proximity</u>		<u>Jaime</u>	

# Housekeeping Checklist

Location <i>Main f</i>	Inspected by: <i>Jaime G</i>	Badge #: <i>43056</i>	Shift: <i>1</i>	Inspection Date: <i>11-17-05</i>
---------------------------	---------------------------------	--------------------------	--------------------	-------------------------------------

OK	Not OK	NA	Housekeeping Item Description	Corrective Measure	Assigned To	Date Completed
<i>11/17</i>			<u>Area Hazards</u>			
			- Crane rails are free of grease			
			- Lines, leads, and hoses are properly routed and organized			
			- Standing water is removed from the work area			
<i>11/17</i>			<u>Area Access</u>			
			- Designated walkways are clear and unobstructed			
			- Fire lanes are clear and unobstructed	<i>More Fire Ex. Box</i>	<i>Jaime</i>	
			- Access ladders are cleared at both top & bottom			
			- Storm drains are clear and unobstructed			
<i>11/17</i>			<u>Material Storage</u>			
			- Material and equipment are stored and organized			
			- Bins, shelves & cabinets are not overloaded			
			- Obsolete fixtures, tools & materials are sent to reclamation	<i>BZG E.A.T. - File Cabinet</i>	<i>Jaime</i>	
			- Other Properly stored and organized issues	<i>Stored outside - Bunkie</i>		
<i>11/17</i>			<u>General Clean Up</u>			
			- Work areas, roadways & walkways are swept up and clean	<i>7/5 (empty) #25 - Clean out for new</i>	<i>Jaime</i>	
			- All debris, trash, paper, cans, wood, & dirt are cleaned up	<i>Jaime's Truck - Clean (Jan-24)</i>	<i>Jaime</i>	
			- All trash collection containers are less than 3/4 full			
			- All skip tubs are emptied as required			
			<i>326 EAST - No. 25 Clean up</i>		<i>Jaime</i>	
<i>11/17</i>			<u>Equipment Maintenance</u>			
			- Machinery is clean, leak free, and in safe working condition	<i>332 - Back Sam. Grinder and</i>	<i>Jaime</i>	
			- Areas around machinery are free of debris and clear access	<i>Jaime's cleaning</i>		
			- All electrical covers are in place			
			- Transportation equipment is leak free			
<i>11/17</i>			<u>Hazardous waste and materials</u>			
			- Recyclable material is properly separated.	<i>236 Drum cleaning</i>	<i>Jaime</i>	
			- Hazardous waste is separated from general trash			
			- Secondary containment are free from liquids and rain water			
			- Flammable in Bulk storage has corrosives and Flammables = NO. (car)			
<i>11/17</i>			<u>Hazardous waste labels</u>			
			- Inspect labels for compliance, properly filled out			
			- Labels are legible and easy to read			
			- Labels indicate proper date, name of hazard, etc			
			- Containers in satellite areas have start date less than 9 months old			
			- Containers in non satellite areas have start date less than 30 days old			
<i>11/17</i>			<u>Spills</u>			
			- Any spill is reported to ext. 3401			
			- No unreported spill is present			
			<u>Other</u>			
			<i>Need 2 Ray Drums</i>			

# Housekeeping Checklist

Location <i>Main</i>	Inspected by <i>James G</i>	Badge # <i>93056</i>	Shift <i>1</i>	Inspection Date <i>11-18-05</i>
-------------------------	--------------------------------	-------------------------	-------------------	------------------------------------

OK	Not OK	NA	Housekeeping Item Description	Corrective Measure	Assigned To	Date Completed
			<u>Area Hazards</u>			
			- Crane rails are free of grease			
			- Lines, leads, and hoses are properly routed and organized			
			- Standing water is removed from the work area			
			<u>Area Access</u>			
			- Designated walkways are clear and unobstructed			
			- Fire lanes are clear and unobstructed			
			- Access ladders are cleared at both top & bottom			
			- Storm drains are clear and unobstructed			
			<u>Material Storage</u>			
			- Material and equipment are stored and organized			
			- Bins, shelves & cabinets are not overloaded			
			- Obsolete fixtures, tools & materials are sent to reclamation	<i>284401 Motor - B12-N</i>	<i>Kerr</i>	
			- Other: Properly stored and organized issues	<i>Outside - THINGS IN</i>		
			<u>General Clean Up</u>			
			- Work areas, roadways & walkways, are swept up and clean			
			- All debris, trash, paper, cans, wood, & dirt are cleaned up			
			- All trash collection containers are less than 3/4 full.			
			- All skip tubs are emptied as required			
			<u>Equipment Maintenance</u>			
			- Machinery is clean, leak free, and in safe working condition	<i>382 - Same as before</i>	<i>Carl</i>	
			- Areas around machinery is free of debris and clear access	<i>major cleaning</i>		
			- All electrical covers are in place			
			- Transportation equipment is leak free			
			<u>Hazardous waste and materials</u>			
			- Recyclable material is properly separated.			
			- Hazardous waste is separated from general trash	<i>200 Cans of Paint in 300 Filter Drum</i>	<i>Ric</i>	
			- Secondary containment are free from liquids and rain water			
			- Filters in Red Zone need to be moved to pallet		<i>Zick</i>	
			<u>Hazardous waste labels</u>			
			- Inspect labels for compliance, properly filled out			
			- Labels are legible and easy to read	<i>2 Diesel Fuel</i>		
			- Labels indicate proper date, name of hazard, etc.	<i>3 Orange drums</i>	<i>1 white label</i>	<i>Carl 11-18-05</i>
			- Containers in satellite areas have start date less than 9 months old	<i>2 More 2nd Containment</i>		
			- Containers in non satellite areas have start date less than 30 days old			
			<u>Spills</u>			
			- Any spill is reported to ext. 8401			
			- No unreported spill is present			
			<u>Other</u>			

**Instructions:** This form may be used to conduct the required self-inspection of a hazardous waste tank system. The inspection by the tank system operator or owner is required on a **daily** basis pursuant to the California Code of Regulations (CCR), Title 22, section 66265.195. Generators of hazardous waste that are large quantity generators or onsite waste treatment operations using a tank system to manage waste are required to conduct these inspections. The tank system inspection records are required to be onsite, available for inspector review, and kept for at least 3 years. If the tank system or a component of the tank system (i.e. piping, pumps, valves, secondary containment, sump, etc.) is in poor condition or unfit for service, the tank system operator must take proactive steps to investigate, repair, and/or replace the equipment, parts, or components as required in section 66265.196 of Title 22 CCR.

### **Title 22 CCR, §66265.195 Tank System Inspections**

(a) The owner or operator shall inspect, where present, at least once each operating day:

- (1) overflow/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order;
- (2) the aboveground portions of the tank system, if any, to detect corrosion or releases of waste;
- (3) data gathered from monitoring equipment and leak-detection equipment, (e.g., pressure and temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design;
- (4) the construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation); and
- (5) for uncovered tanks, the level of waste in the tank, to ensure compliance with section 66265.194(b)(3).

(b) The owner or operator shall inspect cathodic protection systems, if present, according to, at a minimum, the following schedule to ensure that they are functioning properly:

- (1) the proper operation of the cathodic protection system shall be confirmed within six months after initial installation, and annually thereafter; and
  - (2) all sources of impressed current shall be inspected and/or tested, as appropriate, at least bimonthly (i.e., every other month).
- (c) The owner or operator shall document in the operating record of the facility an inspection of those items in subsections (a) and (b) of this section.

## HAZARDOUS WASTE TANK SY TEM DAILY INSPECTION LOG

(AS REQUIRED BY 22 CCR 66265.195)

Business Name:

NASSCO

Month: NOV

Year: 2005

Business Address:

2798 HARBOR, SAN DIEGO, CA

Tank System ID: USED OIL BLD 26

D	Is 2ndary containment free of waste and liquid?	Is the system free of corrosion And evident damage?	Are pipes, valves and pumps free of leaks and in good condition?	Do open tanks have at least 2 ft. of free board?	Are leak detection program/ equipment working?	Inspected by	Comments
A	YES	NO	YES	NO	YES	NO	
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22	X		X		X		OK
23	X		X		X		OK
24							Leaks & vents
25							THANKS & vents
26							SAFETY
27							SW
28							
29							
30							
31							



Hugo Bermudez  
<hbermude@nassco.com>  
11/28/2005 02:54 PM

To: Clint Seiter/R9/USEPA/US@EPA  
cc  
bcc  
Subject: RE: NASSCO Inspection November 16, 2005

Mr. Seiter:

Just following up, did you get my previous emails?

Hugo

-----Original Message-----

**From:** Hugo Bermudez [mailto:hbermude@nassco.com]  
**Sent:** Monday, November 28, 2005 11:07 AM  
**To:** 'Hugo Bermudez'; 'seiter.clint@epa.gov'  
**Subject:** RE: NASSCO Inspection November 16, 2005

One more email.

Hugo

-----Original Message-----

**From:** Hugo Bermudez [mailto:hbermude@nassco.com]  
**Sent:** Monday, November 28, 2005 11:05 AM  
**To:** 'seiter.clint@epa.gov'  
**Subject:** RE: NASSCO Inspection November 16, 2005

Here is additional email.

Hugo

-----Original Message-----

**From:** Hugo Bermudez [mailto:hbermude@nassco.com]  
**Sent:** Monday, November 28, 2005 11:04 AM  
**To:** 'seiter.clint@epa.gov'  
**Subject:** NASSCO Inspection November 16, 2005

Mr. Clinton Seiter:

The Environmental Engineering Department documented the items or compliance concerns during the inspection of November 16, 2005 and issued ECAR's (Environmental Corrective Action Requests) to the responsible departments.

The items are handled through NASSCO's Environmental Management System (EMS) Corrective Action Request (ECAR) program which initiates an investigation, corrective action and review of the compliance by NASSCO's Compliance Assurance Committee (CAC). The CAC is composed of 6 top management officials from different departments to review and recommend additional corrective and preventative actions.

I have attached the ECAR's (PDF's) which include a summary, corrective or planned action(s), before and after pictures to demonstrate actions taken for each item. Please note the ECAR's may or may not currently have a response or

cause entered as they have 10 days to response and investigate. The completed ECAR's will be provided to you as soon as they become available.

There are additional emails following this as I could not get all in one email due to size.

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 |  
hbermude@nassco.com





Hugo Bermudez  
<hbermude@nassco.com>  
12/01/2005 03:24 PM

To: Clint Seiter/R9/USEPA/US@EPA  
cc: John.Kolb@sdcounty.ca.gov  
bcc:  
Subject: NASSCO Corrective Actions Update 1 of 5

Clint:

Attached please find the updated corrective action forms indicated by a date. All items have now been completed except for the following:

ECAR 041: Some materials in the HazMat area have not been picked up by the disposal facility transporter as profile are currently being developed for the waste. This action is scheduled to be completed early next week.

ECAR 043: Currently scheduled to have Mary X-Ray (contractor) pick up and dispose of the silver recovery material in the photo lab and scheduled for 12/02/05.

As per our telecom, the paint was still within the 90 days after the expiration date. In addition, I have provided (attached to ECAR) Work Instruction 103 from the Paint Department which describes the management of expired paints and the paint inventory log. Please note that the Work Instruction was first issued December 1998 with a revision in December 2001 to include the handling of expired paints. All the paints have an expiration date either hand written on the container or printed bar code from the manufacture as described in the work instruction. I will provide you with a copy of the last paint inventory tomorrow as paint department personnel are gone for the day.

There are additional emails following this as I could not get all in one email due to size (5 total).

I forgot to ask in my last note if you wanted me to copy James Polek?

Please, if you have any questions or need clarification don't hesitate to contact me direct at 619 544 7780, cell at 619 997 2690 or via email.

Have a great weekend,

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



EC ECAR 045 113005.pdf EC ECAR 043 112905.pdf EC ECAR 037 112905.pdf



## Environmental Corrective Action Request (ECAR)

EC-2005-045

ISSUED DATE: 11/17/2005

Issued To: Blast & Paint (16)

Judie Blakey  
Superintendent, Production  
Phone: (619) 544-8443  
Mailstop: 02

Reported By: John Martin

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-045, to ensure that you meet the required deadline. Please reference EC-2005-045 on any attachments that are submitted.

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Wheelabrator area. The following item of non-compliance were noted that need corrective action:

1. The paint water curtain sludge collection tank need a cover to prevent spillage.
2. Two HW paint sludge drums were identified in the same satellite accumulation area.

### Regulatory and/or EMS Reference:

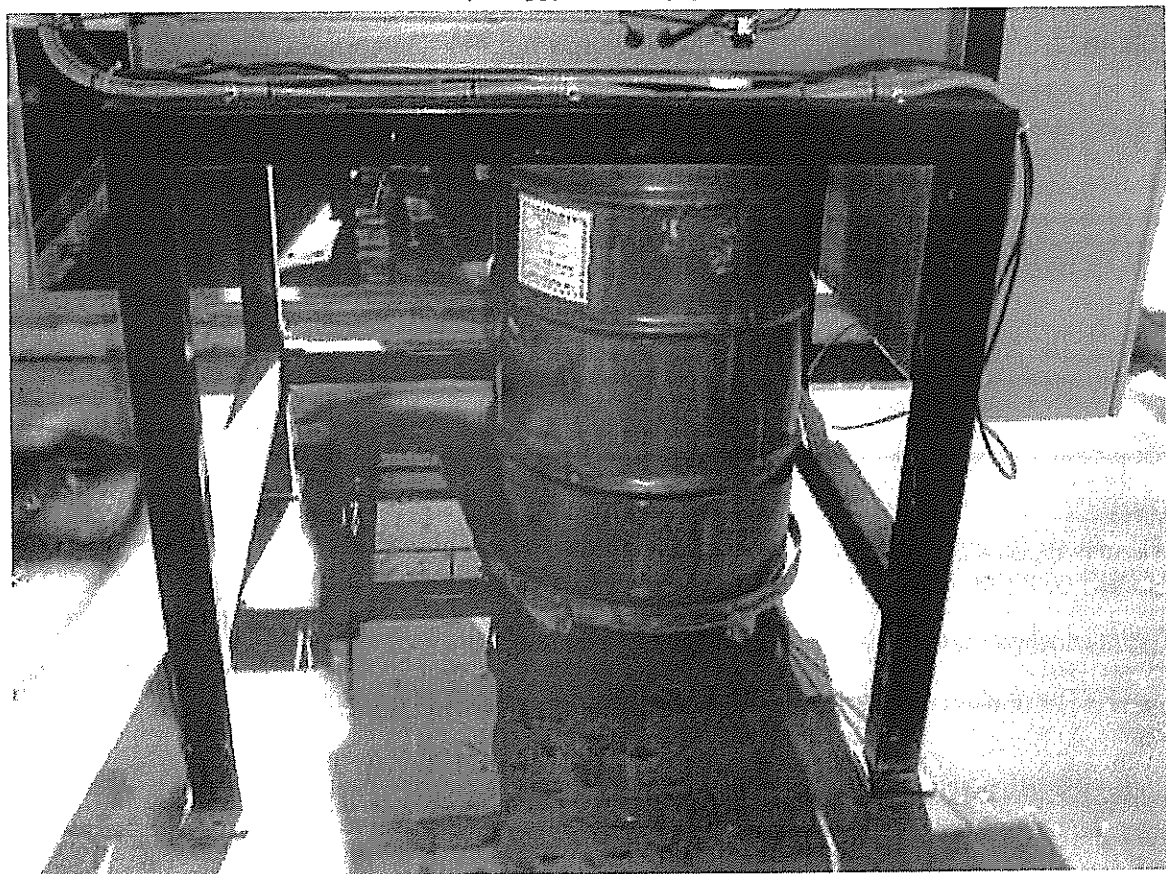
### Corrective Action Response:

- a) A cover was fabricated and installed on the drum on 11/29/05.
- b) Reviewed environmental requirements with the hazmat coordinator and insured the drums were moved to hazmat on 11/18/05.

/s/ Fred Winston on 11/30/2005

Before pictures: Drop chute for drum will be manufactured to prevent spillage.

pic0063.jpg (2048x1536x24b jpeg)

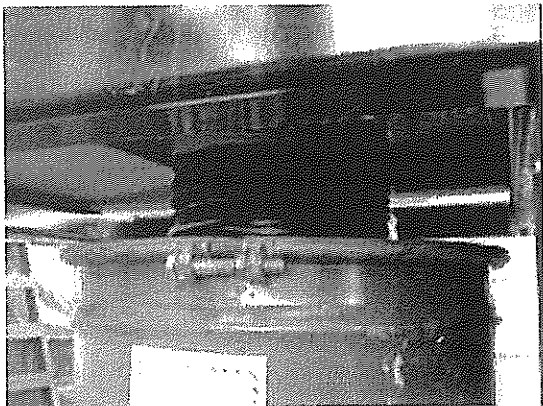
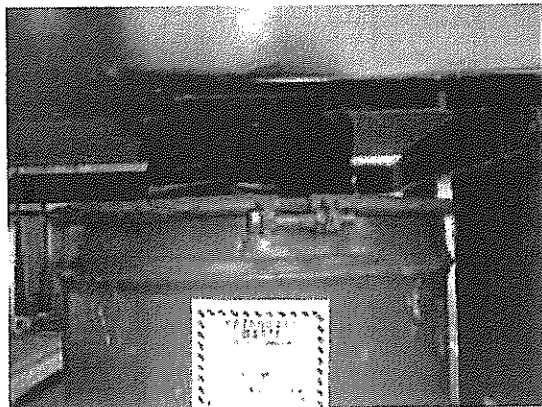
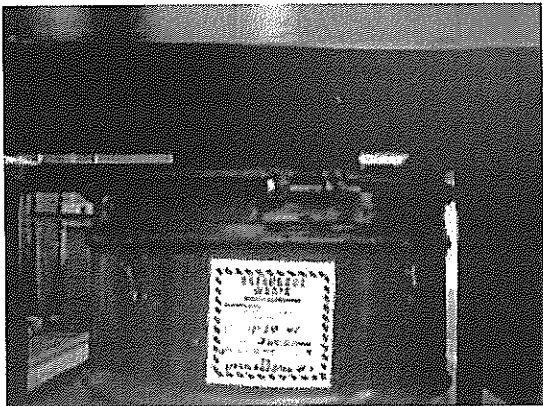
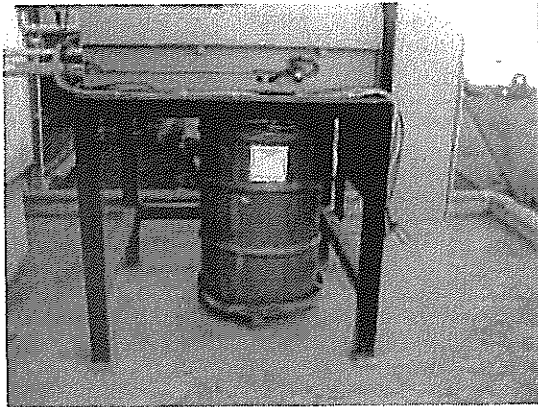
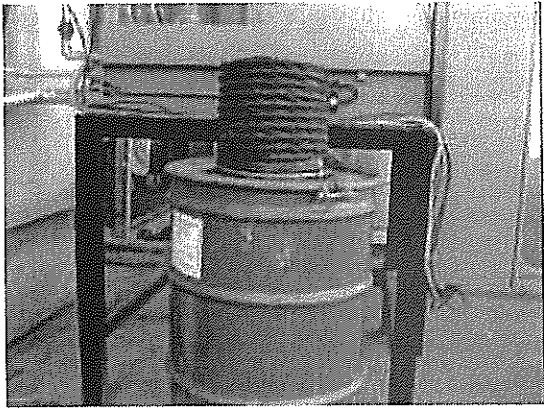


After pictures: Hazardous waste drum sludge has been removed from the same satellite accumulation area and a drop chute will be manufactured for the existing drum.

pic0015.jpg (2048x1536x24b jpeg)



After pictures: Hazardous waste drum with drop chute installed to prevent spillage.





## Environmental Corrective Action Request (ECAR)

---

EC-2005-043

ISSUED DATE: 11/17/2005

Issued To: Corporate Relations (94)

Reported By: John Martin

Jan Carnahan  
Marketing and Graphics Assistant  
Phone: (619) 544-8825  
Mailstop: 211

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

---

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-043, to ensure that you meet the required deadline. Please reference EC-2005-043 on any attachments that are submitted.

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### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Photographic Department lab in Building 8. The following non-compliance item was noted that need corrective action:

1. The HW label on the Silver recovery waste container was over the one year storage period for replacement.

### Regulatory and/or EMS Reference:

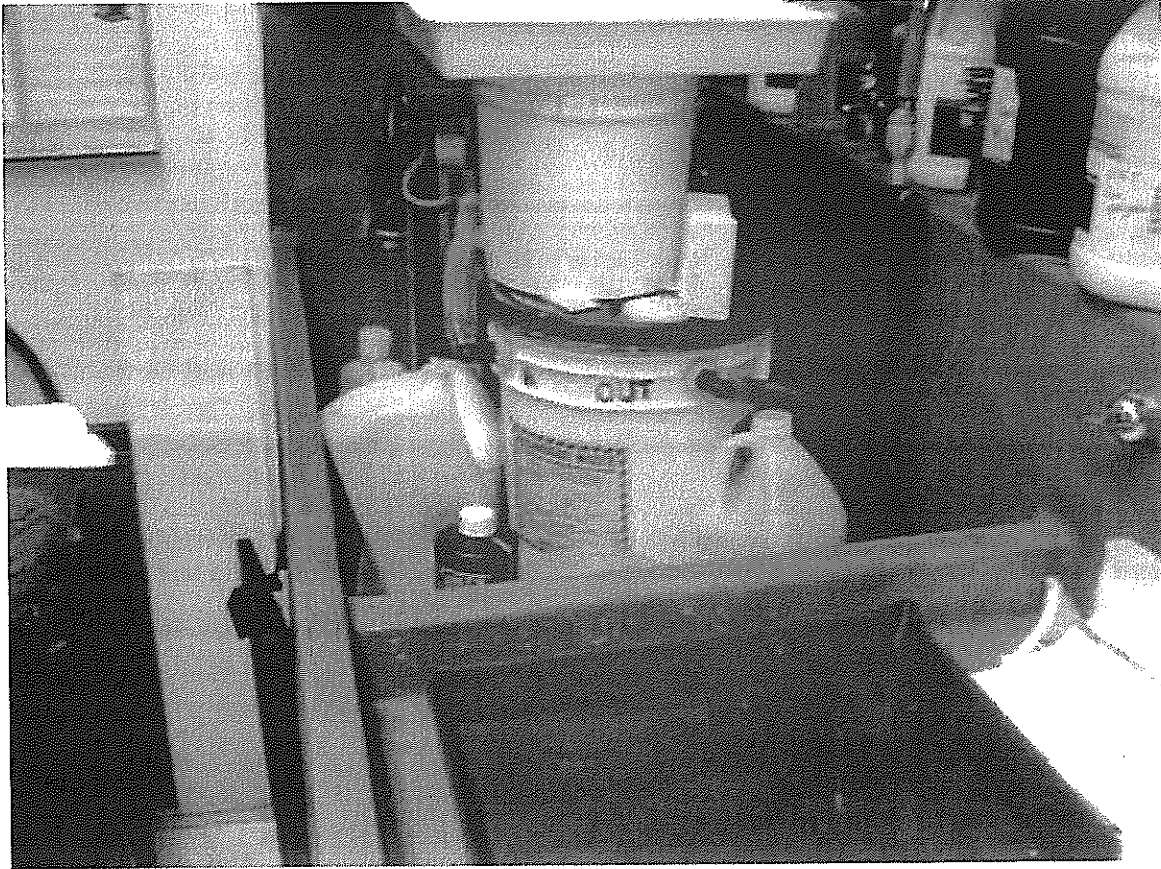
### Corrective Action Response:

Open requisition for service of three 5-gallon canisters for silver recovery systems. May X-Ray will be subcontracted for this service.

/s/ John Walden on 11/22/05.

Before pictures

pic0050.jpg (2048x1536x24b.jpg)







NATIONAL STEEL AND SHIPBUILDING COMPANY

MACHINE SHOP PURCHASE REQUISITION

RECOMMENDED VENDOR:

MERRY X-RAY CHEMICAL CORP.

858-565-9923

PHONE 858-565-2409 FAX

LINE ITEM	QUANTITY	UNIT	DESCRIPTION	UNIT PRICE	AMOUNT
			PROVIDE SERVICE FOR		
			SILVER RECOVERY SYSTEMS		
	3		5 GAL. CANISTER SYSTEM	EA 130. <sup>00</sup>	
				X 3	
			SERVICE CHARGE 75. <sup>00</sup> EA		= 390. <sup>00</sup>
			1 EA METAL PHOTO SHD	BLD. 8	EA 75. <sup>00</sup>
				X 3	
					= 225. <sup>00</sup>
			1 EA PLANT PHOTOGRAPHER		
			DARK ROOM BLD 8	TOTAL	615. <sup>00</sup>
			1 EA N.D.T. (NON DESTRUCTIVE		
			TESTING) DARK ROOM	BLD. 8	

REQUISITION NUMBER

PURCHASE ORDER NUMBER

DELIVERY LOCATION

NA-308

DATE REQUIRED

ASAP

END USE

REQUISITION DATE

EXTENSION

SIGNATURE

AUTHORIZED BY

WORK ORDER / %

/

/

/

/

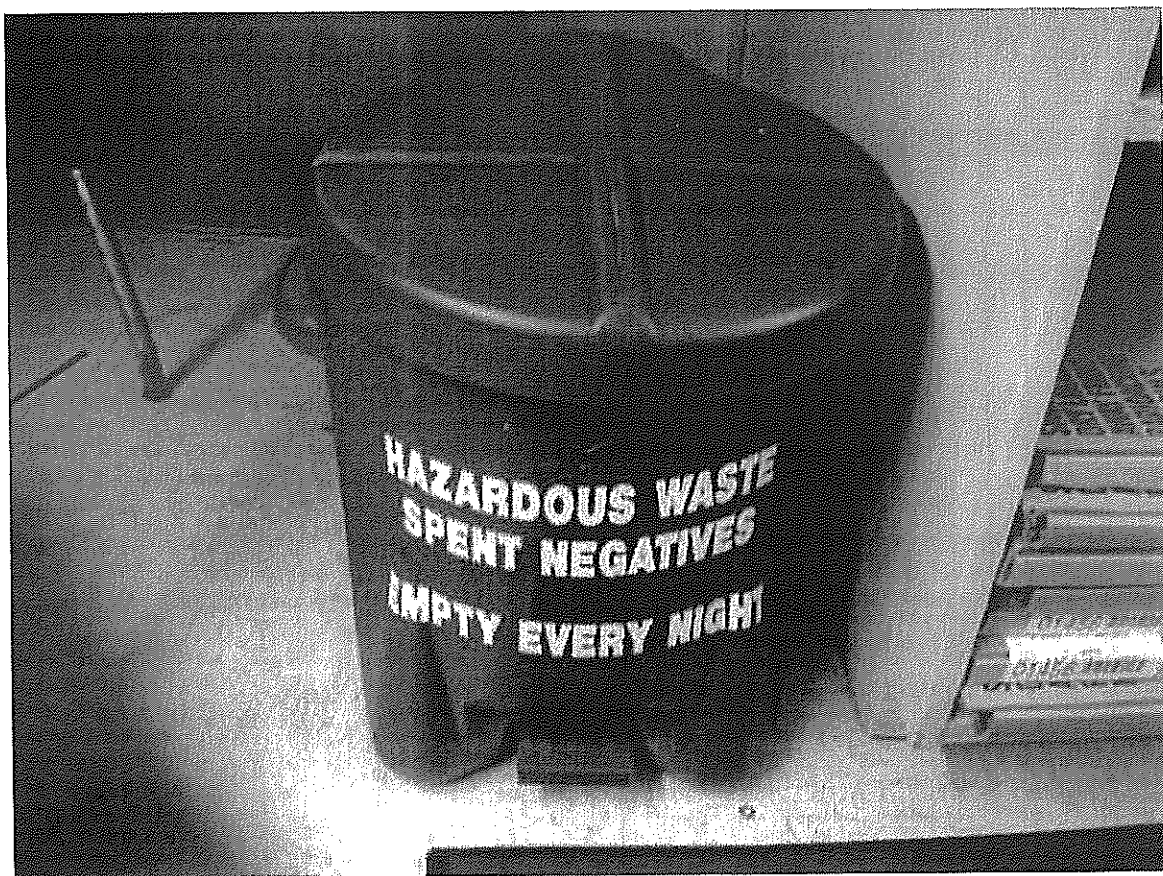
/

CALL JOE # 8433

30 NOVEMBER



After Picture: A temporary hazardous waste container has been implemented in the photo lab and will be emptied on a daily basis.





## Environmental Corrective Action Request (ECAR)

EC-2005-037

ISSUED DATE: 11/17/2005

Issued To: Machining Division (3)

Randy Hurless

Phone: (619) 544-8434

Mailstop: 15

Reported By: John Martin

Environmental Engineering

Phone: (619) 544-3553

Fax: (619) 744-1088

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-037, to ensure that you meet the required deadline. Please reference EC-2005-037 on any attachments that are submitted.

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Machine Shop. The following items were noted that need corrective action:

1. Proper aisle space between HW drums to allow for proper drum inspection to check for any leaks, proper labeling or damage to the drums.
2. Photographic negatives need hazardous waste container with a lid. The container needs a hazardous waste label or label with the words hazardous waste and empty daily.

### Regulatory and/or EMS Reference:

### Corrective Action Response:

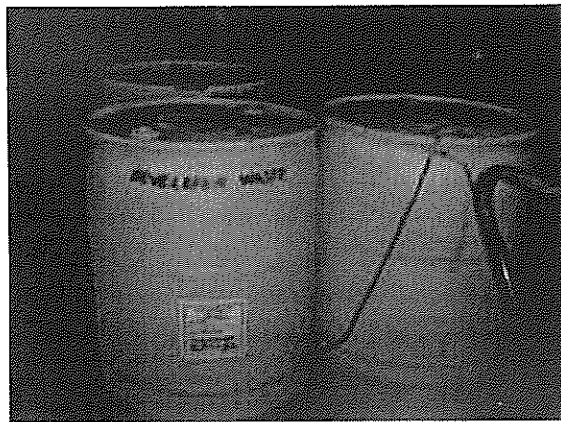
1b) Secondary containment (drums) will be moved to allow proper spacing and access to drums for inspections - COMPLETE

1b) Drums containing new and waste materials will be separated from each other - COMPLETE

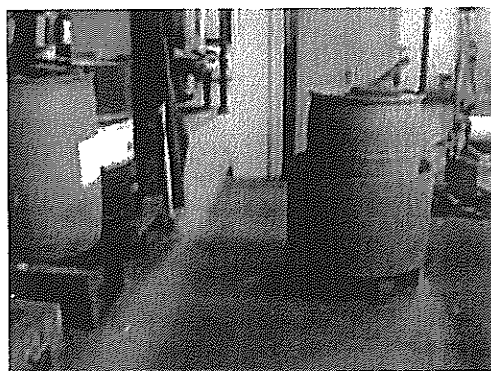
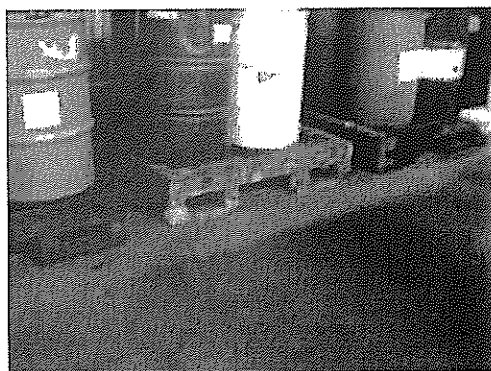
2) Photographic spent film will be handled in a flip top 10 gallon container and properly labeled "hazardous waste" to identify the contents. The container will be emptied daily - ECD 11/29/05

/s/ John Walden 11/22/2005

Before pictures: New containers for spent film have been ordered with lid and will be utilized.



After pictures: The hazardous waste drums have been move to provide proper aisle spacing for drums inspections. New and waste material has been separated.





## D&D TOOL & SUPPLY

Corporate Office: 1028 Buenos Ave a San Diego, CA 92110  
Phone 619-276-9100 a Fax 619-276-9108  
[www.ddtool.com](http://www.ddtool.com)

After: Purchase requisition for spent film containers.

### CUSTOMER / SUPPLIER Fax Cover Sheet

Contact us:

**Purchasing Fax: (619)398-8355**

E-mail: [purchasing@ddtool.com](mailto:purchasing@ddtool.com)

**A/R Fax: (619)398-1910**

A/R E-mail: [ar@ddtool.com](mailto:ar@ddtool.com)

**Sales Fax: (619)276-9199**

Sales E-mail: [expert@ddtool.com](mailto:expert@ddtool.com)

*Suppliers Please Ship To:*

**D&D TOOL & SUPPLY - Br# 01**  
1028 Buenos Ave  
San Diego, CA 92110

\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*

To : JOHN WALDEN

Fax# : 1-619-544-7901

From : STEVE FOX

Co. Name : NASSCO/P CARD

Message :

JOHN BOTH ITEMS IN STOCK L A THEY WILL BE HERE MONDAY !!!

\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*

\*\* ACKNOWLEDGEMENT \*\*

D & D TOOL & SUPPLY  
 1028 BUENOS AVENUE  
 SAN DIEGO CA 92110  
 619-276-9100 Fax 619-276-9199  
 www.ddtool.com

Order #: S1453839  
 Rel# :  
 Printed: 09:45:59 23 NOV 2005  
 Page # : 1 of 1

Sold To:  
 NASSCO/P CARD  
 HARBOR DR & 28TH  
 SAN DIEGO, CA 92113

Ship To:  
 NASSCO/P CARD  
 HARBOR DR & 28TH  
 SAN DIEGO, CA 92113

619-544-8529

Ordered by	Order Date	Ship Date	Ship Via	Warehouse
JOHN WALDEN	11/23/05	11/25/05	VANCE O. BR01	Shp 1 Prc 1

Writer	Salesperson	Customer PO#	Freight Allowed
STEVE FOX	Vance Oesterling	CC/ JOHN WALDEN	No

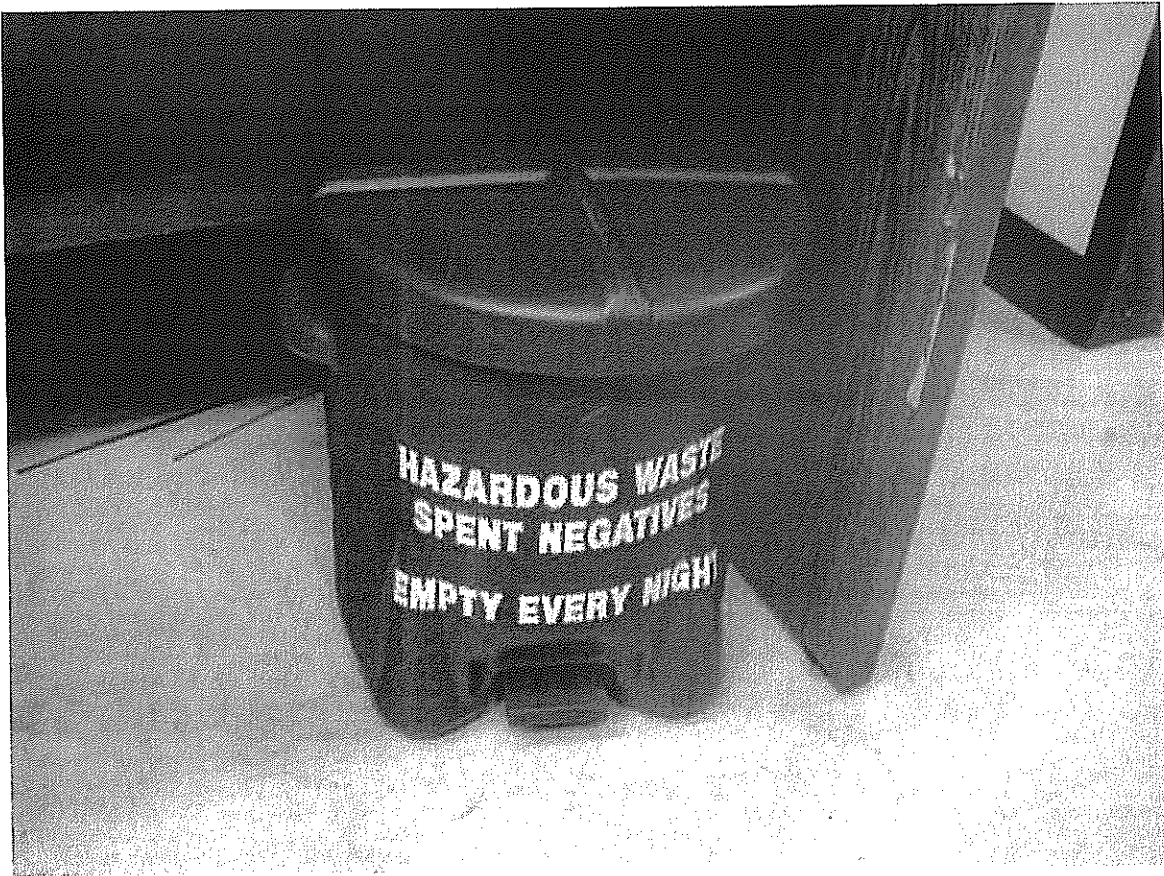
Ln#	Ordered	Product Description	Unit Price	Net
1	4ea	WAS 955056 6 GALLON POLY OILY WASTE CAN W/FT LVR *****	50.500	202.00
2	1ea	WAS 955196 10X9 FUNNEL W/6 FLAME ARRESTR JUSTRITE *****	180.000	180.00

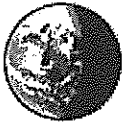
SUBTOTAL 382.00

Total Amount 382.00

.. Reprint .. Reprint .. Reprint .. Reprint ..

After Picture: A temporary hazardous waste container has been implemented in the Label Shop and will be emptied on a daily basis.





Hugo Bermudez  
<hbermude@nassco.com>  
12/01/2005 03:25 PM

To: Clint Seiter/R9/USEPA/US@EPA  
cc: John.Kolb@sdcounty.ca.gov  
bcc:  
Subject: RE: NASSCO Corrective Actions Update 2 of 5

2 of 5

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



EC ECAR 038 112905.pdf





## Environmental Corrective Action Request (ECAR)

EC-2005-038

ISSUED DATE: 11/17/2005

Issued To: Quality Assurance (80)

Keith Londot  
Manager, Quality Assurance  
Phone: (619) 544-8802  
Mailstop: 10

Reported By: John Martin

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-038, to ensure that you meet the required deadline. Please reference EC-2005-038 on any attachments that are submitted.

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of NDT. The following items of non-compliance were noted that need corrective action:

1. Waste photographic chemicals need hazardous waste accumulation labels affixed to all storage containers.
2. Any waste photographic negatives will be placed in a container with a lid and have a hazardous waste label or a label with hazardous waste statement and empty daily wording will be attached to the container.

### Regulatory and/or EMS Reference:

### Corrective Action Response:

NDT Inspection Lab was generally unaware of the labeling requirements for spent film and developing chemicals.

Corrective actions have been accomplished on items 1 and 2:

- 1) A container will be purchased and marked "Waste Radiographic Film" and "Empty Daily."
- 2) Containers for waste photographic fixer and waste photographic developer have been properly labeled with an approved hazmat label and marked "Empty Daily". Containers were also placed in secondary containment.

/s/ Bill Huston on 11/23/2005

Before pictures



After pictures: New containers for spent film have been ordered with lids and will be utilized.



After pictures: The spent fixer and developer chemicals have been properly labeled and secondary containment applied to prevent accidental spillage.





## D&D TOOL & SUPPLY

Corporate Office: 1028 Buenos Ave # San Diego, CA 92110  
Phone 619-276-9100 # Fax 619-276-9108  
[www.ddtool.com](http://www.ddtool.com)

After: Purchase requisition for spent film containers.

### CUSTOMER / SUPPLIER Fax Cover Sheet

Contact us:

**Purchasing Fax: (619)398-8355**

E-mail: [purchasing@ddtool.com](mailto:purchasing@ddtool.com)

**A/R Fax: (619)398-1910**

A/R E-mail: [ar@ddtool.com](mailto:ar@ddtool.com)

**Sales Fax: (619)276-9199**

Sales E-mail: [expert@ddtool.com](mailto:expert@ddtool.com)

*Suppliers Please Ship To:*

**D&D TOOL & SUPPLY - Br# 01**  
1028 Buenos Ave  
San Diego, CA 92110

\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*

To : JOHN WALDEN

Fax# : 1-619-544-7901

From : STEVE FOX

Co. Name : NASSCO/P CARD

Message :

JOHN BOTH ITEMS IN STOCK L A THEY WILL BE HERE MONDAY !!!

\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*\*\* Fax \*\*

\*\* ACKNOWLEDGEMENT \*\*

D & D TOOL & SUPPLY  
 1028 BUENOS AVENUE  
 SAN DIEGO CA 92110  
 619-276-9100 Fax 619-276-9199  
 www.ddtool.com

Order #: S1453839  
 Rel# :  
 Printed: 09:45:59 23 NOV 2005  
 Page # : 1 of 1

Sold To:  
 NASSCO/P CARD  
 HARBOR DR & 28TH  
 SAN DIEGO, CA 92113

Ship To:  
 NASSCO/P CARD  
 HARBOR DR & 28TH  
 SAN DIEGO, CA 92113

619-544-8529

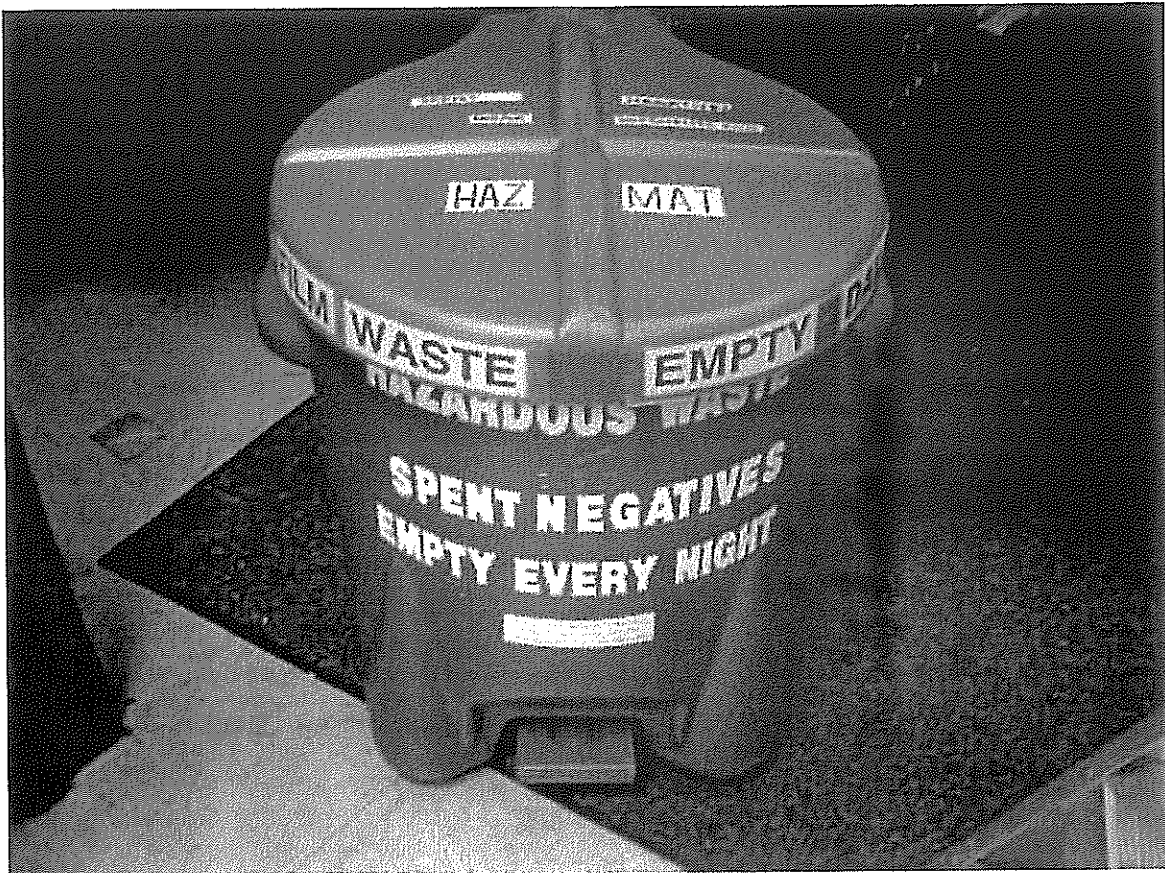
Ordered by JOHN WALDEN	Order Date 11/23/05	Ship Date 11/25/05	Ship Via VANCE O. BR01	Warehouse Shp 1 Prc 1
---------------------------	------------------------	-----------------------	---------------------------	--------------------------

Writer STEVE FOX	Salesperson Vance Oesterling	Customer PO# CC/ JOHN WALDEN	Freight Allowed No
---------------------	---------------------------------	---------------------------------	-----------------------

Ln#	Ordered	Product Description	Unit Price	Net
1	4ea	WAS 955056 6 GALLON POLY OILY WASTE CAN W/FT LVR *****	50.500	202.00
2	1ea	WAS 955196 10X9 FUNNEL W/6 FLAME ARRESTR JUSTRITE *****	180.000	180.00
SUBTOTAL				382.00
Total Amount				382.00

.. Reprint .. Reprint .. Reprint .. Reprint ..

After Pictures: A temporary hazardous waste container has been implemented in the NDT lab and will be emptied on a daily basis.





Hugo Bermudez  
<hbermude@nassco.com>  
12/01/2005 03:26 PM

To ""Hugo Bermudez"" <hbermude@nassco.com>, Clint  
Seiter/R9/USEPA/US@EPA  
cc John.Kolb@sdcounty.ca.gov  
bcc

Subject RE: NASSCO Corrective Actions Update 2 of 5

3 of 5

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 |  
hbermude@nassco.com



EC ECAR 039 112905.pdf





## Environmental Corrective Action Request (ECAR)

EC-2005-039

ISSUED DATE: 11/17/2005

Issued To: Maintenance (62)

Reported By: John Martin

Mark Kukuchek  
Director T&T, Maint., Facilities  
Phone: (619) 544-8799  
Mailstop: 38-A

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-039, to ensure that you meet the required deadline. Please reference EC-2005-039 on any attachments that are submitted.

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Maintenance area. The following items of non compliance were noted that need corrective action:

1. Large yellow used oil tank needs a daily inspection log to identify any leaks or waste in secondary containment area.
2. NiCad batteries were identified with lead acid batteries in the Maintenance battery storage area. NiCad batteries are required to be managed as Universal Waste. Batteries require a covered container for storage and a Universal Waste label.

### Regulatory and/or EMS Reference:

### Corrective Action Response:

BMP 111 "Universal Waste" does not cover proper separation of batteries, Ni Cads and Lead Acid.

Item 1) Set up daily log thru 12/31/06, also added tank check to maintenance daily housekeeping walkthroughs.

Item 2) Correctly sorted batteries, disposed of Ni Cads batteries as universal waste, also set up covered plastic waste drum as "Universal Waste" for future NiCad battery disposal.

Set up training for supervision to better identify hazmat and handling.

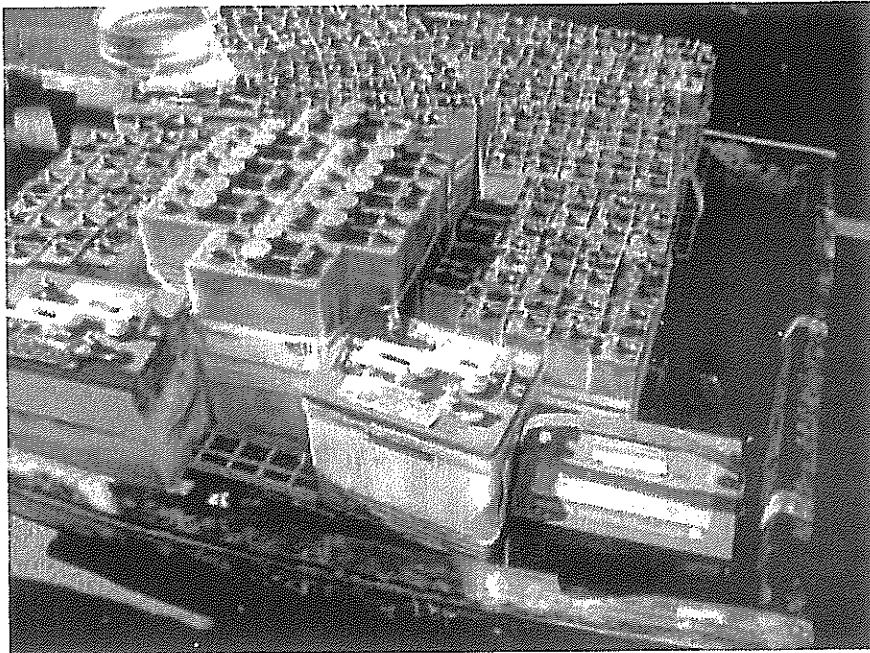
/s/ Carl Whitaker on 11/22/2005

Before Pictures: A new tank inspection checklist has been generated and implemented for the oil tank.



PCT0053.JPG  
2048x1536x24b.jpg

Action in process:



PCT0054.JPG  
2048x1536x24b.jpg

Daily checklist for the yellow oil tank (one week) and new form (below) as started on November 21, 2005

# Housekeeping Checklist

Location			Inspected by	Badge #	Shift	Inspection Date
Maintenance			Tamara G.	43056	1	10-14-15
OF	OK	NA	Housekeeping Item Description	Corrective Measure	Assigned To	Date Completed
			<b>Area Hazards</b>			
			- Crane rails are free of grease			
			- Lines, leads, and hoses are properly routed and organized			
			- Standing water is removed from the work area			
			<b>Area Access</b>			
			- Designated walkways are clear and unobstructed			
			- Fire lanes are clear and unobstructed			
			- Access ladders are cleared at both top & bottom			
			- Storm drains are clear and unobstructed			
			<b>Material Storage</b>			
			- Material and equipment are stored and organized	Fix Shop Needs Organizing	Tam	
			- Bins, shelves & cabinets are not overloaded			
			- Obsolete fixtures, tools & materials are sent to reclamation	Backs behind Bldg 26	JGIMP	
			- Other: Properly stored and organized issues	need cleaning		
			- Main Receiving has same material for several days		JGIMP	
			<b>General Clean Up</b>			
			- Work areas, roadways & walkways are swept up and clean			
			- All debris, trash, paper, cans, wood, & dirt are cleaned up	Boiler Oil/Wash Basin Area	Tam	
			- All trash collection containers are less than 3/4 full	needs clean up	Tam	
			- All skip tubs are emptied as required			
			<b>Equipment Maintenance</b>			
			- Machinery is clean, leak free, and in safe working condition	Tractor needs cleaning @ Bldg 12	JGIMP	
			- Areas around machinery is free of debris and clear access			
			- All electrical covers are in place			
			- Transportation equipment is leak free			
			<b>Hazardous waste and materials</b>			
			- Recyclable material is properly separated			
			- Hazardous waste is separated from general trash			
			- Secondary containment are free from liquids and rain water			
			- Potable Fuel tank has crack in 2042V containment		Tam	
			<b>Hazardous waste labels</b>			
			- inspect labels for compliance, properly filled out			
			- Labels are legible and easy to read			
			- Labels indicate proper date, name of hazard, etc.			
			- Containers in satellite areas have start date less than 9 months old			
			- Containers in non satellite areas have start date less than 30 days old			
			<b>Spills</b>			
			- Any spill is reported to ext 8401			
			- No unreported spill is present			
			<b>Other</b>			

# Housekeeping Checklist

Location: <u>Maintenance</u>			Inspected by: <u>Jaime G</u>	Badge #: <u>43056</u>	Shift: <u>1</u>	Inspection Date: <u>11-15-05</u>
OK	Not OK	NA	Housekeeping Item Description	Corrective Measure	Assigned To	Date Completed
			<u>Area Hazards</u>			
			- Crane rails are free of grease			
			- Lines, leads, and hoses are properly routed and organized			
			- Standing water is removed from the work area			
			<u>Area Access</u>			
			- Designated walkways are clear and unobstructed			
			- Fire lanes are clear and unobstructed			
			- Access ladders are cleared at both top & bottom			
			- Storm drains are clear and unobstructed			
			<u>Material Storage</u>			
			- Material and equipment are stored and organized - <u>Remove woodwork from Pipe Thruway - KRL's</u>			
			- Bins, shelves & cabinets are not overloaded			
			- Obsolete fixtures, tools & materials are sent to reclamation - <u>B26 - Yard Service</u>		<u>BUZZ</u>	
			- Other: Properly stored and organized issues	<u>Material needs proper storage -</u>		
			<u>General Clean Up</u>			
			- Work areas, roadways & walkways, are swept up and clean			
			- All debris, trash, paper, cans, wood, & dirt are cleaned up			
			- All trash collection containers are less than 3/4 full.			
			- All skip tubs are emptied as required			
			- <u>Bldg 8-East - Old door needs to be thrown away</u>		<u>BUZZ</u>	
			<u>Equipment Maintenance</u>			
			- Machinery is clean, leak free, and in safe working condition - <u>Grinder Box &amp; Steam Pit</u>			
			- Areas around machinery is free of debris and clear access - <u>3 ea grease guns hanging on side</u>		<u>Angel</u>	
			- All electrical covers are in place			
			- Transportation equipment is leak free			
			<u>Hazardous waste and materials</u>			
			- Recyclable material is properly separated.			
			- Hazardous waste is separated from general trash			
			- Secondary containment are free from liquids and rain water			
			<u>Hazardous waste labels</u>			
			- Inspect labels for compliance, properly filled out			
			- Labels are legible and easy to read			
			- Labels indicate proper date, name of hazard, etc.			
			- Containers in satellite areas have start date less than 9 months old			
			- Containers in non satellite areas have start date less than 30 days old			
			<u>Spills</u>			
			- Any spill is reported to ext. 8401			
			- No unreported spill is present			
			<u>Other</u>			
			- <u>B. 82 - North - 2 ea. Fire Extinguishers on Floor</u>		<u>Mages</u>	
			- <u>" " Bandsaw/Grinder Need Clean Up</u>		<u>Royce</u>	
			- <u>" " Rucks (East) Remove damaged Fixtures</u>		<u>Mages</u>	
			- <u>" " Empty Trash in Smoking Area</u>		<u>Mages</u>	

Where do we dispose of contaminated materials such as  
Paper, Corncobs, Plastic, wood etc?

## Housekeeping Checklist

Location: <i>Main 1</i>	Inspected by: <i>Tamara G</i>	Badge #: <i>43052</i>	Shift: <i>1</i>	Inspection Date: <i>11-16-05</i>
----------------------------	----------------------------------	--------------------------	--------------------	-------------------------------------

OK	Not OK	NA	Housekeeping Item Description	Corrective Measure	Assigned To	Date Completed
			<u>Area Hazards</u>			
			- Crane rails are free of grease			
			- Lines, leads, and hoses are properly routed and organized			
			- Standing water is removed from the work area			
			<u>Area Access</u>			
			- Designated walkways are clear and unobstructed			
			- Fire lanes are clear and unobstructed <i>See last item</i>			
			- Access ladders are cleared at both top & bottom			
			- Storm drains are clear and unobstructed			
			<u>Material Storage</u>			
			- Material and equipment are stored and organized			
			- Bins, shelves & cabinets are not overloaded <i>- B12 - Work Bench clutter</i>		<i>Kris</i>	
			- Obsolete fixtures, tools & materials are sent to reclamation			
			- Other: Properly stored and organized issues			
			<u>General Clean Up</u>			
			- Work areas, roadways & walkways, are swept up and clean <i>+ Pipe Thread Table works</i>		<i>Kris</i>	
			- All debris, trash, paper, cans, wood, & dirt are cleaned up <i>(Clean up B12 NE)</i>			
			- All trash collection containers are less than 3/4 full.			
			- All skip tubs are emptied as required			
			<u>Equipment Maintenance</u>			
			- Machinery is clean, leak free, and in safe working condition <i>- B-200 - 1st A82 (NE)</i>		<i>Simon</i>	
			- Areas around machinery is free of debris and clear access <i>- B82 - 2nd 82 is dirty</i>		<i>Frank</i>	
			- All electrical covers are in place			
			- Transportation equipment is leak free			
			<u>Hazardous waste and materials</u>			
			- Recyclable material is properly separated. <i>- City Reg Drum <del>is</del> overfilled</i>		<i>Carl</i>	
			- Hazardous waste is separated from general trash			
			- Secondary containment are free from liquids and rain water			
			<u>Hazardous waste labels</u>			
			- Inspect labels for compliance, properly filled out			
			- Labels are legible and easy to read			
			- Labels indicate proper date, name of hazard, etc.			
			- Containers in satellite areas have start date less than 9 months old			
			- Containers in non satellite areas have start date less than 30 days old			
			<u>Spills</u>			
			- Any spill is reported to ext. 8401			
			- No unreported spill is present			
			<u>Other</u>			
			<i>Fire Equipment auto blocking hydrant in B12 room</i>		<i>Tamara</i>	

# Housekeeping Checklist

Location <i>Maint</i>	Inspected by: <i>Jaime G</i>	Badge #: <i>43056</i>	Shift: <i>1</i>	Inspection Date: <i>11-17-05</i>
--------------------------	---------------------------------	--------------------------	--------------------	-------------------------------------

OK	Not OK	NA	Housekeeping Item Description	Corrective Measure	Assigned To	Date Completed
			<b>Area Hazards</b>			
			- Crane rails are free of grease			
			- Lines, leads, and hoses are properly routed and organized			
			- Standing water is removed from the work area			
			<b>Area Access</b>			
			- Designated walkways are clear and unobstructed			
			- Fire lanes are clear and unobstructed	<i>Mow Fire Ex. Box</i>	<i>Jaime</i>	
			- Access ladders are cleared at both top & bottom			
			- Storm drains are clear and unobstructed			
			<b>Material Storage</b>			
			- Material and equipment are stored and organized			
			- Bins, shelves & cabinets are not overloaded			
			- Obsolete fixtures, tools & materials are sent to reclamation	<i>- B26 EAST - File cabinet</i>	<i>Jaime</i>	
			- Other: Properly stored and organized issues	<i>Stored outside - Paint</i>		
			<b>General Clean Up</b>			
			- Work areas, roadways & walkways are swept up and clean	<i>1/5 Convey #25 - Clean outside</i>	<i>Jaime</i>	
			- All debris, trash, paper, cans, wood & dirt are cleaned up	<i>- Target Truck - Clean Exhaust</i>	<i>Jaime</i>	
			- All trash collection containers are less than 3/4 full.			
			- All skip tubs are emptied as required			
			<i>B26 EAST - Road is cleaned</i>		<i>Jaime</i>	
			<b>Equipment Maintenance</b>			
			- Machinery is clean, leak free, and in safe working condition	<i>332 - Band Saw / Grinder and</i>	<i>Jaime</i>	
			- Areas around machinery is free of debris and clear access	<i>Service Cleaning</i>		
			- All electrical covers are in place			
			- Transportation equipment is leak free			
			<b>Hazardous waste and materials</b>			
			- Recyclable material is properly separated.	<i>- RAS Drum overflowing</i>	<i>Jaime</i>	
			- Hazardous waste is separated from general trash			
			- Secondary containment are free from liquids and rain water			
			- <i>Flam. locked in Bulk storage has Corrosives and Flammables = None.</i>		<i>Jaime</i>	
			<b>Hazardous waste labels</b>			
			- Inspect labels for compliance, properly filled out			
			- Labels are legible and easy to read			
			- Labels indicate proper date, name of hazard, etc			
			- Containers in satellite areas have start date less than 9 months old			
			- Containers in non satellite areas have start date less than 30 days old			
			<b>Spills</b>			
			- Any spill is reported to ext. 9401			
			- No unreported spill is present			
			<b>Other</b>			
			<i>* Need 2 Rag Drums *</i>			

# Housekeeping Checklist

Location: <i>Main</i>	Inspected by: <i>James G</i>	Badge #: <i>93056</i>	Shift: <i>1</i>	Inspection Date: <i>11-18-05</i>
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OK	Not OK	NA	Housekeeping Item Description	Corrective Measure	Assigned To	Date Completed
			<u>Area Hazards</u>			
			- Crane rails are free of grease			
			- Lines, leads, and hoses are properly routed and organized			
			- Standing water is removed from the work area			
			<u>Area Access</u>			
			- Designated walkways are clear and unobstructed			
			- Fire lanes are clear and unobstructed			
			- Access ladders are cleared at both top & bottom			
			- Storm drains are clear and unobstructed			
			<u>Material Storage</u>			
			- Material and equipment are stored and organized			
			- Bins, shelves & cabinets are not overloaded			
			- Obsolete fixtures, tools & materials are sent to reclamation	<i>Isolation Motor - B12-N</i>	<i>Kerr</i>	
			- Other: Properly stored and organized issues	<i>Outside - Tires in</i>		
			<u>General Clean Up</u>			
			- Work areas, roadways & walkways, are swept up and clean			
			- All debris, trash, paper, cans, wood, & dirt are cleaned up			
			- All trash collection containers are less than 3/4 full			
			- All skip tubs are emptied as required			
			<u>Equipment Maintenance</u>			
			- Machinery is clean, leak free, and in safe working condition	<i>382 - Same problem noted (382)</i>		
			- Areas around machinery is free of debris and clear access	<i>Major cleaning</i>		
			- All electrical covers are in place			
			- Transportation equipment is leak free			
			<u>Hazardous waste and materials</u>			
			- Recyclable material is properly separated.			
			- Hazardous waste is separated from general trash	<i>Seal cans of Paint in 30, 1 Filter Drum - Ric</i>		
			- Secondary containment are free from liquids and rain water			
			- <i>Filters in Red Zone need to be moved to pallet</i>		<i>Zick</i>	
			<u>Hazardous waste labels</u>			
			- Inspect labels for compliance, properly filled out			
			- Labels are legible and easy to read			
			- Labels indicate proper date, name of hazard, etc.	<i>3 Orange Drums - 1 Metal 16 gal - CARL 11-18-05</i>		
			- Containers in satellite areas have start date less than 9 months old	<i>3 Orange Drums - 1 Metal 16 gal - CARL 11-18-05</i>		
			- Containers in non satellite areas have start date less than 30 days old	<i>3 Orange Drums - 1 Metal 16 gal - CARL 11-18-05</i>		
			<u>Spills</u>			
			- Any spill is reported to ext. 8401			
			- No unreported spill is present			
			<u>Other</u>			

**Instructions:** This form may be used to conduct the required self-inspection of a hazardous waste tank system. The inspection by the tank system operator or owner is required on a daily basis pursuant to the California Code of Regulations (CCR), Title 22, section 66265.195. Generators of hazardous waste that are large quantity generators or onsite waste treatment operations using a tank system to manage waste are required to conduct these inspections. The tank system inspection records are required to be onsite, available for inspector review, and kept for at least 3 years. If the tank system or a component of the tank system (i.e. piping, pumps, valves, secondary containment, sump, etc.) is in poor condition or unfit for service, the tank system operator must take proactive steps to investigate, repair, and/or replace the equipment, parts, or components as required in section 66265.196 of Title 22 CCR.

### **Title 22 CCR, §66265.195 Tank System Inspections**

(a) The owner or operator shall inspect, where present, at least once each operating day:

- (1) overfill/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order;
- (2) the aboveground portions of the tank system, if any, to detect corrosion or releases of waste;
- (3) data gathered from monitoring equipment and leak-detection equipment, (e.g., pressure and temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design;
- (4) the construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation); and
- (5) for uncovered tanks, the level of waste in the tank, to ensure compliance with section 66265.194(b)(3).

(b) The owner or operator shall inspect cathodic protection systems, if present, according to, at a minimum, the following schedule to ensure that they are functioning properly:

- (1) the proper operation of the cathodic protection system shall be confirmed within six months after initial installation, and annually thereafter; and
  - (2) all sources of impressed current shall be inspected and/or tested, as appropriate, at least bimonthly (i.e., every other month).
- (c) The owner or operator shall document in the operating record of the facility an inspection of those items in subsections (a) and (b) of this section.



# HAZARDOUS WASTE TANK SYSTEM DAILY INSPECTION LOG

(AS REQUIRED BY 22 CCR 66265.195)

Business Name: NASSCO

Month: NOV

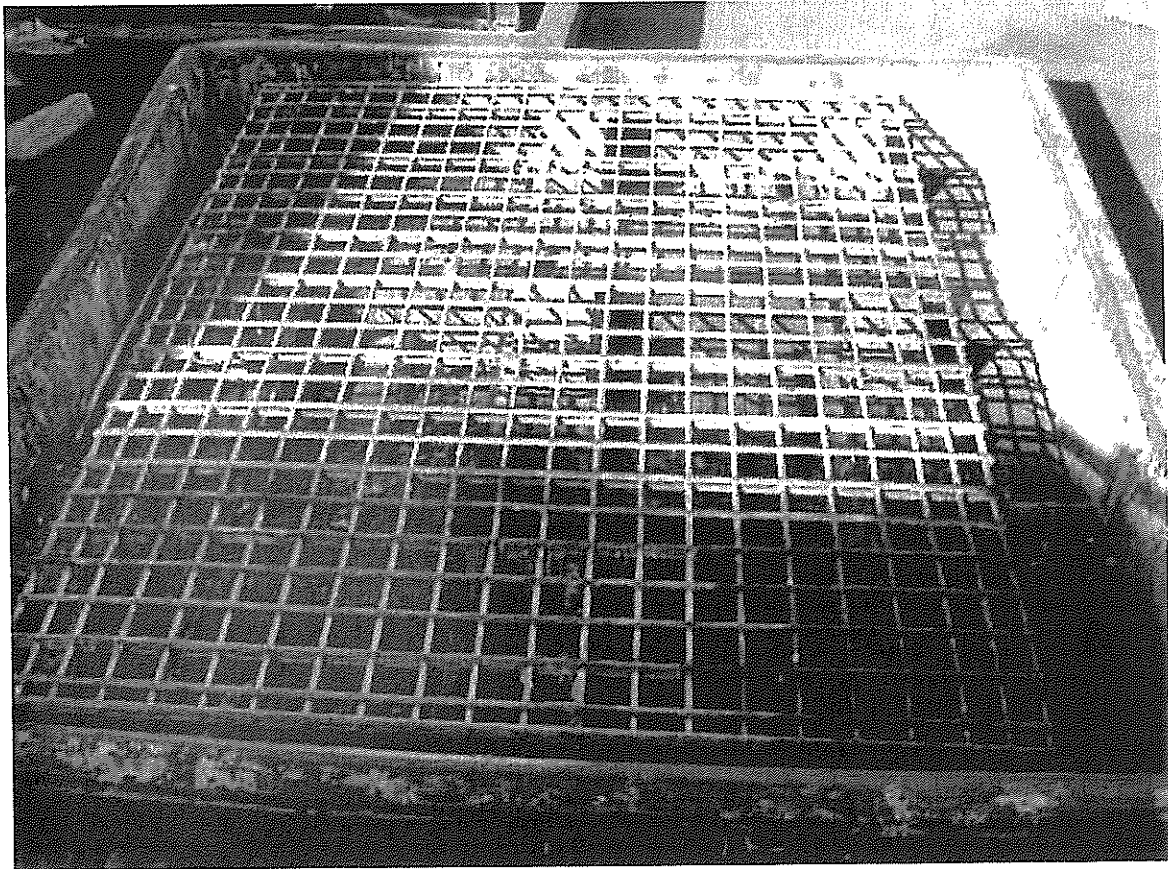
Year: 2005

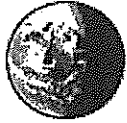
Tank System ID: USED OIL BLD 26

Business Address: 2798 HARBOR, SAN DIEGO, CA

DAY	Is 2 <sup>nd</sup> ary containment free of waste and liquid?		Is the system free of corrosion And evident damage?		Are pipes, valves and pumps free of leaks and in good condition?		Do open tanks have at least 2 ft. of free board?		Are leak detection program/ equipment working?		Inspected by	Comments
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO		
1												
2												
3												
4												
5												
6												
7												
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18												
19												
20												
21	X		X		X		X		X		Can	
22	X		X		X		X		X		Can	
23	X		X		X		X		X		Can	
24												Thanks G. Vins
25												Thanks G. Vins
26												Son T. Vins
27												S. Vins
28												
29												
30												
31												

After Pictures: The batteries have been sent to the hazmat department as universal waste for proper disposal.





Hugo Bermudez  
<hbermude@nassco.com>  
12/01/2005 03:28 PM

To "Hugo Bermudez" <hbermude@nassco.com>, Clint  
Seiter/R9/USEPA/US@EPA  
cc John.Kolb@sdcounty.ca.gov  
bcc

Subject RE: NASSCO Corrective Actions Update 4 of 5

4 of 5

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 |  
hbermude@nassco.com



EC ECAR 041 112905.pdf



## Environmental Corrective Action Request (ECAR)

EC-2005-041

ISSUED DATE: 11/17/2005

Issued To: Warehouse (55)

Reported By: John Martin

Robert Trick  
Manager, Steel Production Control  
Phone: (619) 544-7588  
Mailstop: 37

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-041, to ensure that you meet the required deadline. Please reference EC-2005-041 on any attachments that are submitted.

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Haz-Mat Department. The following items were identified as non-compliance that need corrective action:

1. Waste Ni Cad batteries were not in proper storage container and had no Universal Waste labels on containers
2. Waste fluorescent tubes were not in proper storage containers and had no Universal Waste labels
3. Tri-Sodium Phosphate waste containers had HW label with end accumulation date over 90 day storage period.
4. Dave Power's employee job description does not provide haz-mat responsibilities
5. Drum storage area does not have the proper aisle space

### Regulatory and/or EMS Reference:

### Corrective Action Response:

Items 1-3

Universal waste containers for the batteries and tubes were delivered to Ashland for complete disposal by 12/08/05.

Ashland provided a profile for the TSP. Waste was disposed of on 11/28/05.

Min-Max for universal waste containers and labels to be established. ECD 11/30/05.

Dave Power was instructed to report hazmat exceptions to management and be reviewed weekly at the steel yard white board. Completed 11/28/05.

Item 4

see attached Warehouseman job description and training log.

Item 5

Drums congesting the area were dumped per procedure as of 11/28/05 allowing complete access to all drums. Drum processing recommended to occur weekly instead of every three weeks. ECD 12/01/05.



## Environmental Corrective Action Request (ECAR)

---

/s/ Robert Trick on 11/29/2005

Before pictures



PIC0066.JPG  
2048x1536/24b.jpg



PIC0067.JPG  
2048x1536/24b.jpg



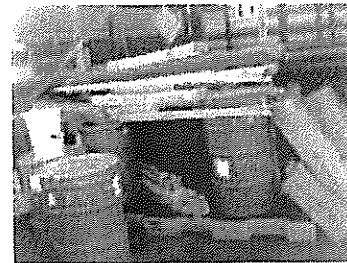
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2048x1536/24b.jpg



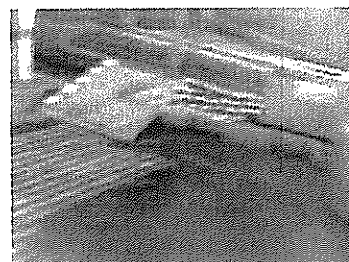
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PIC0070.JPG  
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PIC0072.JPG  
2048x1536/24b.jpg



PIC0073.JPG  
2048x1536/24b.jpg



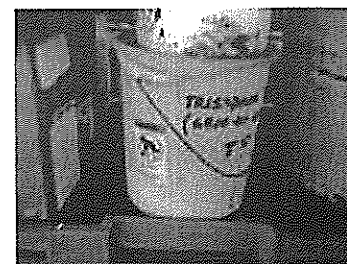
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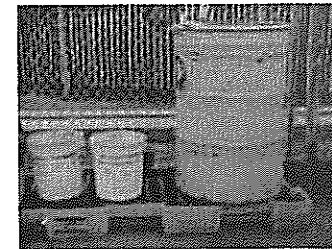
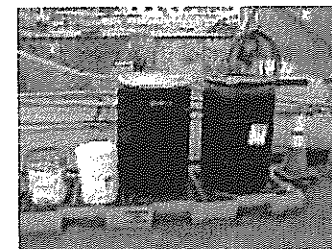
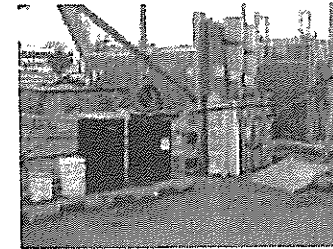
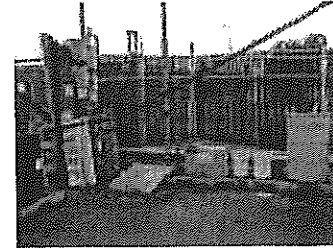
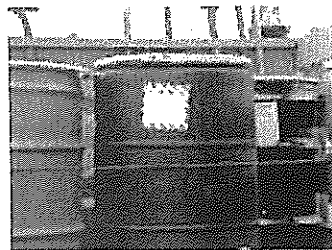
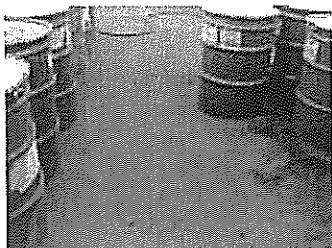


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PIC0077.JPG  
2048x1536/24b.jpg

After Pictures: The following items have been addressed: Hazwaste drums have been moved and now have proper aisle spacing, NiCad batteries and fluorescent tubes have been placed in proper containers and labeled as universal waste, Tri-Sodium waste have been properly labeled and scheduled for pick up on November 30, 2005, Dave Power job description and training has been provide below.



To : Mike Chee Fax 1088  
From : Bob Trick x-7588  
2 pages

November 24, 1992

### WAREHOUSEMAN

Job descriptions for Dave Power of the Hazmat Department including ongoing training classes.

In order for a Journeyman Warehouseman to obtain a rating of "2" for ability, he/she must possess the following basic abilities. Anything less will be classified as a "1".

### BASIC ABILITIES

1. Successfully pass the NASSCO Journeyman Forklift Operators examination. Be able to operate three of the following industrial fork truck types:
  - Gasoline/diesel powered yard truck.
  - Propane/Electric powered Receiving dock truck.
  - Electric Warehouse Stacker/Reach truck.
  - Electric OrderPicker or Narrow Aisle (Man-up) trucks.
2. Read, write and understand English. Must have legible hand writing.
3. General math skills (addition, subtraction, multiplication and division).
4. Basic understanding of NASSCO's computerized Materials and Inventory Systems.
5. Unpack and inventory inbound material, match to packing slips, freight bills and other documentation.
6. Determine proper storage locations, store material and update the computer system.
7. Maintain quantity and location accuracy of NASSCO owned and Contract owned inventory.
8. Pick and process material issues using manually written and computer generated documents.
9. Able to repetitively lift 50 pounds.

### ADDITIONAL ABILITIES

In order for a Warehouseman to obtain a rating of "3" for ability, he/she must have all of the basic abilities, plus ALL of the additional abilities listed below.

1. Prepare appropriate documents (i.e. Transportation/Damage Report (TDR), Over/Short & Damaged reports (OS&D), Material Return Adjustment (MRA), etc.)



2. Interaction with vendors, purchasing, material control, and production customers; both written and verbal.
3. Recommend adjustments to stock levels, reorder points, and order quantities.
4. Solve difficulties such as issue quantity discrepancies, marking/tagging errors, transportation/delivery errors, location/quantity discrepancies.
5. Understand and effectively use advanced Materials/Inventory and Planning/Production computer systems to organize work and research material demands.
6. Expertise in unique processes and procedures for at least 8 of the following material types:
  - N/C Schedule A GFM or owner furnished
  - N/C Material Order Schedule (MOS)
  - N/C Fabrication Order Schedule (FOS)
  - N/C Steel and Pipe
  - N/C Spares/Fitting out materials
  - N/C Electrical Cable
  - N/C Non-spec material
  - NASSCO owned Min-Max and Surplus Inventories
  - Ship Repair GFM
  - Ship Repair CF material
  - Maintenance, Repair and Operating Materials
  - NASSCO Archives
  - Hazardous Materials (HAZMAT)
7. Must have significant cross-trade abilities as a Tool Room Attendant, Material Chaser, or pass the journeyman's test to operate an overhead, tower, or portal crane.
8. Understands common material identification codes, symbols, grades, and sizes. Able to employ basic material inspection techniques with this knowledge.
9. Able to operate all warehousing forklift trucks listed in the basic requirements.

A Warehouseman may be classified a "3" by also knowing ALL of the basic requirements, plus have passed the basic journeyman assessment test of another major trade, listed below:

- |                     |               |
|---------------------|---------------|
| - Inside Machinist  | - Electrician |
| - Outside Machinist | - Sheet Metal |
| - Welder            | - Shipfitter  |
| - Pipefitter        |               |

A Warehouseman may be classified a "4" by obtaining required abilities to qualify him/her as a "3" plus pass a basic journeyman assessment test of another major trade as listed above.

**Hugo Bermudez**

---

**From:** Chad Haza [chaza@nassco.com]  
**Sent:** Tuesday, November 22, 2005 9:10 AM  
**To:** 'Hugo Bermudez'  
**Subject:** D. Powers | NASSCO Training  
Dave Power 50698

Course	Completion	Session
ENV-10: HazMat Coordinator Training Refresher 2005	06/22/2005	C
RCRA/DOT Training, 40 CFR 262.34 & 49 CFR 172.700: 2005	06/23/2005	A
ENV-10: HazMat Coordinator Training Refresher 2004	04/21/2004	C
ENV-10: HazMat Coordinator Training Refresher 2003	05/13/2003	C
ENV-01: HazMat Coordinator Training 2002	07/31/2002	E
2005 SPCC Briefing 40 CFR Part 112	09/29/2005	A

**Chad Haza**  
*Environmental Administrator*  
National Steel and Shipbuilding Company  
**T 619.544.8826**  
**F 619.744.1088**  
<mailto:chaza@nassco.com>

11/28/2005



Hugo Bermudez  
<hbermude@nassco.com>  
12/01/2005 03:29 PM

To "Hugo Bermudez" <hbermude@nassco.com>, Clint  
Seiter/R9/USEPA/US@EPA  
cc John.Kolb@sdcounty.ca.gov  
bcc

Subject RE: NASSCO Corrective Actions Update 5 of 5

5 of 5 - Final

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 |  
hbermude@nassco.com



EC ECAR 044 120105.pdf



## Environmental Corrective Action Request (ECAR)

EC-2005-044

ISSUED DATE: 11/17/2005

Issued To: Blast & Paint (16)

Reported By: John Martin

Judie Blakey  
Superintendent, Production  
Phone: (619) 544-8443  
Mailstop: 02

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-044, to ensure that you meet the required deadline. Please reference EC-2005-044 on any attachments that are submitted.

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Small Parts Painting area - Paint Storage. The following item of non-compliance were noted that need corrective action:

1. A number of one gallon paint containers has no expiration dates on the paint containers.
2. One 5 gallon paint can had a expiration date August 2005 with no decision made as to the disposal or recycling of the paint container

### Regulatory and/or EMS Reference:

### Corrective Action Response:

The department was unaware of the regulation 40 CFR 262.11 about expired paint. There is no statement in the ISO 14001 reference guide.

Hugo Bermudez, Environmental Engineer provide the department with the 40 CFR 626.11 regulation to reference the expired paint. The discrepant paint was sent to hazardous waste for disposal.

Our department policy has been to send any expired paint back to the main paint storage site for disposition.

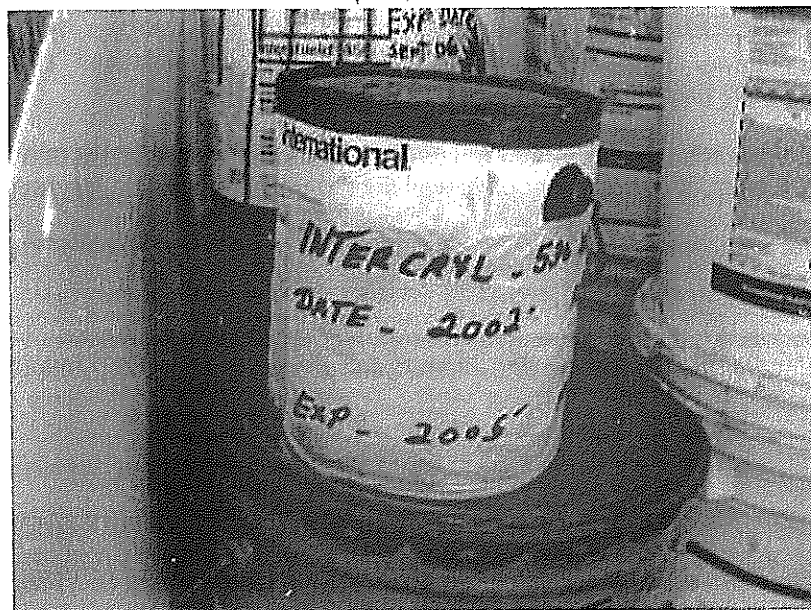
All department supervision will be informed at the weekly staff meeting (next meeting 11/28/05) and there will be a handout for them to present the information to their crews in their 5-minute morning meeting.

/s/ Juan Saludes on 11/22/2005

Before pictures: The paint had an expiration date of August 2005 (still within the 90 days), paint will be disposed before the 90 days. Manifest for the spent paint is attached to this report and the paint is indicated by "Paint Solids" on the manifest.



PICT0086.JPG  
2048x1536x24bpp



PICT0087.JPG  
2048x1536x24bpp

Before pictures: Paint Storage log lists all paints and expiration dates, expired paints are removed from the log and sent to hazmat for proper disposal. This form was last updated on November 29, 2005.

Paint Storage Inventory Controlled				
Paint Type	QTY in Gls	Expiration Date:	Hull Specific?	Remarks:
<b>International Paint:</b>				
Interclene 245-BRA570 (Blk)	170	Feb-2007	Y-BP	Underwater Hull
Interclene 245-BRA572 (Red)	225	Feb-2007	Y-BP	Underwater Hull
Interspeed 640-BRA640 (Red)	65	Jan-2007	Y-T-AKE	Underwater Hull
Interspeed 640-BRA640 (Red)	115	Jul-2007	Y-T-AKE	Underwater Hull
Interspeed 640-BRA642 (Blk)	84	Nov-2006	Y-T-AKE	Underwater Hull
Interspeed 640-BRA642 (Blk)	55	Dec-2006	Y-T-AKE	Underwater Hull
Interspeed 640-BRA642 (Blk)	45	Sept-2006	Y-T-AKE	Underwater Hull
Intercryl 530-DK Brown	9	Sept-2005	N	
Intercryl 530-Med Green	15	Apr-2006	N	
Intercryl 530-Signal Blue	15	Sept-2006	N	
Interlac Haze Gray	5	Apr-2006	N	
Interline 92503-Buff	55	Mar-2006	Y-T-AKE	
Interplate 997-Nippe	5	Dec-2006	N	
Intershield 556-DK Gray	5	Jan-2007	N	Need 1 gl of reactor
Interthane 990-Red	7	Aug-2007	N	
Intertuf 262-KHA302 (Gray)	10	Apr-2007	N	
Intergard 403-KBA401 (Off White)	10	Mar-2006	N	Need 2 gls of reactor
Intergard 631-Gray	5	Dec-2006		Upgrade commercial non-skid
Intergard 621-DK Gray	5	Jan-2007	N	Non-skid EK5040H
Interline 624-THA664 (Red)	75	Jun-2007	Y-T-AKE	
<b>Pro-Line:</b>				
F-34 Binder	5	Feb-2007	N	
26307-Bulkhead Gray	5	Feb-2007	N	
F-42 Med Yellow	4	Feb-2007	N	
F-1000 White	3	Feb-2007	N	
F-424 Pure White	1	Feb-2007	N	
10-Black	1	Feb-2007	N	
<b>Devoe:</b>				
PSX700-Safety Blue	4	Sept-2006	Y-T-AKE	
PSX700-Safety Red	24	Nov-2006	Y-T-AKE	
PSX700-Safety Yellow	34	Oct-2007	Y-T-AKE	
PSX700-Safety Red	6	Apr-2007	Y-BP	
PSX700-Black	2	Apr-2007	Y-BP	
PSX700-Black	2	Jun-2007	Y-T-AKE	
PSX700-White	30	Feb-2008	Y-T-AKE	
<b>Sherwin Williams-Water Base</b>			Asphalt paint for walk-ways	
Sher-cryl-Safety Blue	5	Jul-2007	N	
Sher-cryl-Safety White	20	Jul-2008	N	
Sher-cryl-Safety Green	12	Aug-2007	N	
<b>Miscellaneous</b>				
VPCI-Oil Concentrate	55		T-AKE	
VPCI-Oil Concentrate-322	110			
Tectyl 891D	275			
Tectyl 511M	55			
Cosmoline	110			



Blast, Paint, and General  
Services Manual

## MANAGEMENT OF COATING PRODUCTS

Work Instruction No.: 103  
Revision: D

Approved: /s/ \_\_\_\_\_  
Judie Blakey  
Superintendent, Blast, Paint, and General Services

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Revision Record		
Revision	Date	Description of Change
--	12/18/98	
A	2/01/99	Process flowchart, along with referencing text, updated. Also, minor editorial change.
B	6/01/99	Attachment (4) revised. Also, minor editorial changes.
C	12/01/01	Reference to coating material approval added in para 6.1.1; handling of expired products added as para 6.4; Paint Usage form updated and set in landscape.
D	12/21/01	Re-Issue

WORK INSTRUCTION 103 REV D.doc



**1.0. Purpose:**

To provide instructions for the management of coating products.

**2.0. Scope:**

All management of coating products in all stages of construction.

**3.0. References:**

- (a) NASSCO Blast, Paint, and General Services, Procedure No. 2, Surface Preparation and Paint
- (b) NASSCO Safety Manual, Hazardous Communication, Section 800
- (c) NASSCO Environmental Engineering, Procedure No. 3, Hazardous Materials/Waste Transportation Tracking
- (d) NASSCO Environmental Engineering, Procedure No. 12, Hazardous Waste Satellite Accumulation
- (e) San Diego Air Pollution Control District (APCD) Rules and Regulations
- (f) San Diego Air Pollution Control District (APCD) Permit to Operate 007657, Primeline
- (g) San Diego Air Pollution Control District (APCD) Permit to Operate 911437, Wood Products

**4.0 Definitions:**

None

**5.0 Responsibility:**

The Superintendent of Blast, Paint, and General Services is responsible for ensuring that this work instruction is implemented and followed. Additional responsibility is assigned in Reference (a).

**6.0 Procedure:**

**6.1 Receipt**

6.1.1 The process of receiving coatings from the coating supplier is detailed in Attachment (1), Receipt and Delivery of Coating Products Flow Chart.

6.1.2 The Paint Supervisor or Hazardous Material Coordinator at the satellite storage areas verifies, on receipt and/or delivery, that coating batch numbers are current. To aid verification, Attachment (2), Paint Batch Numbers Reference Tables for Paint Production, shall be posted in all satellite storage areas.

**6.2 Handling**

6.2.1 All coatings, approved according to Reference (b), are handled according to the coating manufacturer's Material Safety Data Sheet (MSDS). Copies of MSDS's are maintained by the Industrial Hygiene department.





6.3 Storage

6.3.1 All coatings are stored according to the coating manufacturer's Product Data Sheet (PDS) and Material Safety Data Sheet (MSDS). Copies of applicable PDS's are maintained by the Industrial Hygiene department.

6.3.2

- (1) Request through the department Material Coordinator that the coating supplier extend the shelf life of the coating and mark the product container as "Shelf Life Extended." The Material Coordinator shall maintain the paperwork.
- (2) Mark the product as "For Maintenance Use Only."
- (3)

6.4 Issue and Usage

6.4.1 Paint production will use the Paint Issue form (Attachment (3)) to order coating materials and the Paint Usage form (Attachment (4)) to record weekly use.

6.4.2 The department Material Coordinator will maintain the data from the issue and usage forms in their paper form and/or in a like database.

6.4.3 The department Material Coordinator will support the usage record keeping and reporting requirements defined in Reference (e), for the following coating operations:

- (1) Architectural Coatings (Rule 67.0)
- (2) Metal Parts and Products Coating Operations (Rule 67.3)
- (3) Wood Products Coating Operations (Rule 67.11)
- (4) Marine Coating Operations (Rule 67.18)
- (5) Motor Vehicles and Mobile Equipment Refinishing Operations (Rule 67.20)

6.4.4 In addition to the requirements defined in paragraph 6.4.3 above, the Material Coordinator or the SOC 1 Paint Supervisor shall ensure that the maximum usage requirements for the Primeline and Wood Products Operations, detailed in References (f) and (g), are not exceeded.

6.5 Paint Waste Management

6.5.1 Paint waste will be managed as detailed in References (c) and (d).



Blast, Paint, and General  
Services Manual

## MANAGEMENT OF COATING PRODUCTS

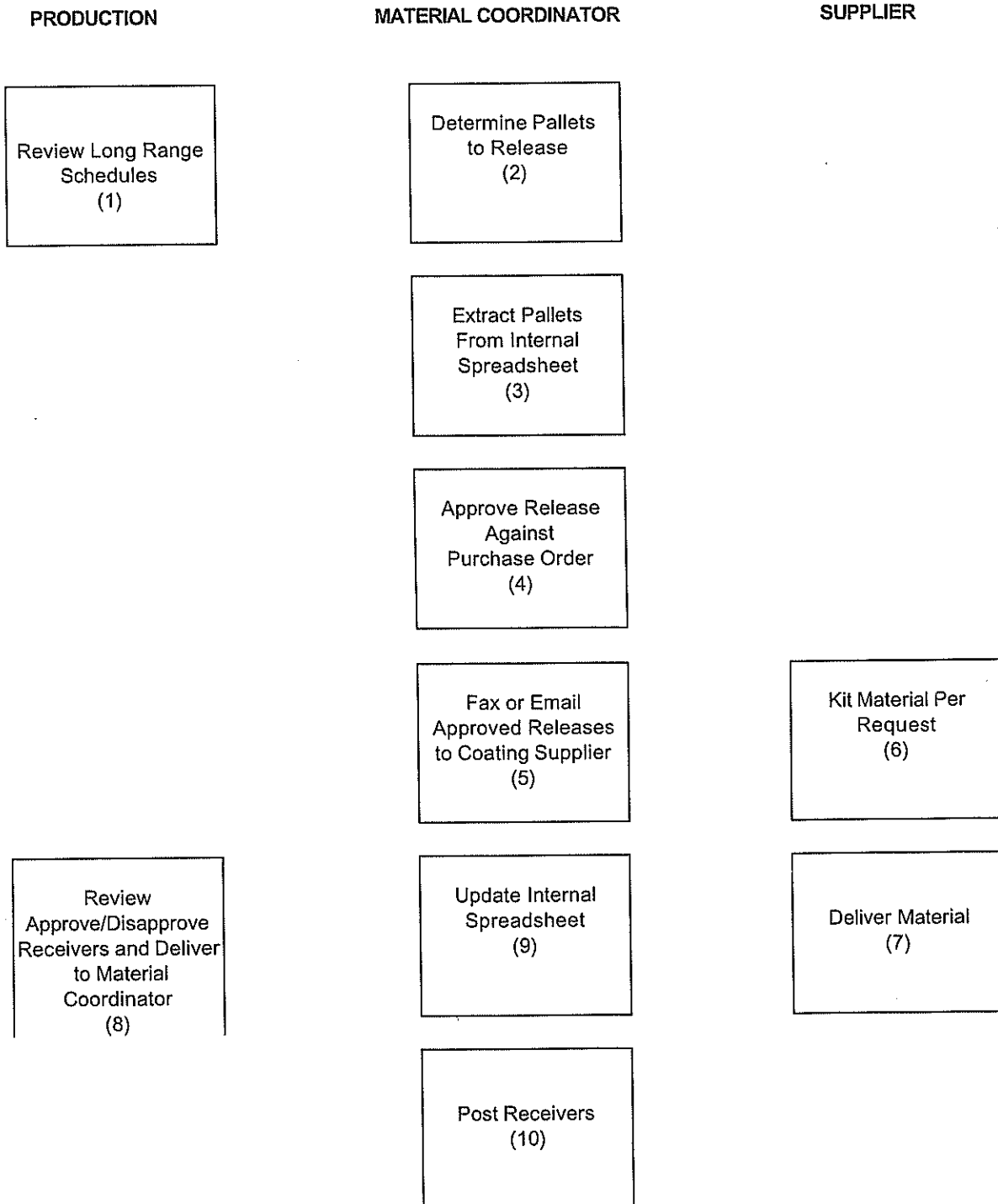
Work Instruction No.: 103  
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### 7.0 Attachments:

- (1) Process Flowchart for the Request and Delivery of Paint
- (2) Paint Batch Reference Numbers Reference Tables for Paint Production (SAMPLE)
- (3) Paint Issue Form
- (4) Paint Usage All Areas Form (SAMPLE)



(1) Process Flowchart for the Request and Delivery of Paint





(2) Paint Batch Reference Numbers Reference Tables for Paint Production (SAMPLE)

**TABLE 1. IDENTIFYING YEAR AND MONTH INFORMATION FROM BATCH NUMBERS**

COATING	EXAMPLE BATCH #	YEAR CODE	YEAR	MONTH/DAY CODE	MONTH
AMERON	L R 2002 0 1 3 2 7 0	2002	2002	01	JANUARY
DEVOE	L R 2002 0 5 0 2 0 8	2002	2002	05	MAY
INTERNATIONAL	2 M 6 6 4 6 U U A 6	2	2002	M	DECEMBER
INTERNATIONAL	C B 1 2 3 4 U H A 1	C	2002	B*	FEBRUARY
PROLINE	7 6 7 0 C 2	2	2002	C	MARCH
SHERWIN WILLIAMS	P M 0 5 0 2 A	2	2002	050**	FEBRUARY 20
SIGMA	02 0 8 - 0 0 1 1	02	2002	08	AUGUST

\*INTERNATIONAL REVISED ITS BATCH NUMBERING SYSTEM BEGINNING IN JANUARY 2000. FOR BATCHES PRIOR TO THAT DATE THE OLD SYSTEM IS STILL IN AFFECT.

\*\*SHERWIN WILLIAMS IDENTIFIES THE BATCH BY YEAR AND BY DAY OF THE YEAR. IN THE EXAMPLE ABOVE, "050" IS THE FIFTIETH DAY OF 2002.

**TABLE 2. IDENTIFYING MONTH OF MANUFACTURE, MAIN COATING SUPPLIERS**

INTERNATIONAL**	PROLINE	AMERON, DEVOE, AND SIGMA
A = JANUARY	A = JANUARY	01 = JANUARY
B = FEBRUARY	B = FEBRUARY	02 = FEBRUARY
C = MARCH	C = MARCH	03 = MARCH
D = APRIL	D = APRIL	04 = APRIL
E = MAY	E = MAY	05 = MAY
F = JUNE	F = JUNE	06 = JUNE
G = JULY	G = JULY	07 = JULY
H = AUGUST	H = AUGUST	08 = AUGUST
J = SEPTEMBER	I = SEPTEMBER	09 = SEPTEMBER
K = OCTOBER	J = OCTOBER	10 = OCTOBER
L = NOVEMBER	K = NOVEMBER	11 = NOVEMBER
M = DECEMBER	L = DECEMBER	12 = DECEMBER

\*\*INTERNATIONAL DOES NOT USE THE LETTER 'I'



Blast, Paint, and General  
Services Manual

## MANAGEMENT OF COATING PRODUCTS

Work Instruction No.: 103  
Revision: D

(3) Paint Issue Form

### PAINT ISSUE

TO  
FROM

DATE

DELIVERY LOCATION

CHARGE NUMBER

PAINT/ SOLVENT	AMOUNT (GALS)	UNIT, ZONE, COMPARTMENT, TANK NUMBER	SQUARE FEET	GALS SENT	BATCH NUMBER			
					PAINT	GALS	CONVERTOR REACTOR	GALS

SUPERVISOR'S SIGNATURE \_\_\_\_\_

SHIPPER'S SIGNATURE \_\_\_\_\_

1. FILL OUT THIS FORM COMPLETELY. USE SEPARATE SHEET FOR EACH CHARGE NUMBER.
2. SUBMIT COMPLETED FORM TO MATERIAL COORDINATOR/SR PLANNER SCHEDULER.
3. PAINT WILL BE DELIVERED ACCORDING TO JUST IN TIME SCHEDULE.

Blast, Paint, and General  
Services Department  
Department 016/022

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Date: 12/21/01  
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Blast, Paint, and General  
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## MANAGEMENT OF COATING PRODUCTS

Work Instruction No.: 103  
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TO  
FROM

DATE

4. SECOND SHIFT MUST FILL OUT THIS FORM AND LEAVE IT IN THE MAILBOX OF THE MATERIAL COORDINATOR.

5. BATCH NUMBERS ARE PROVIDED BY THE PAINT SHIPPER.

(4) Paint Usage All Areas Form (SAMPLE)

DATE:	RULE: (CIRCLE) MARINE ARCH METAL WOOD
LOCATION:	
SUPERVISOR/SUBCONTRACTOR:	

REF NO	VENDOR NAME	PRODUCT NAME	VOC	GALLONS USED EACH DAY AND TOTAL FOR WEEK								METHOD USED (REPORT IN GALLONS)			
				MON	TUE	WED	THU	FRI	SAT	SUN	TOTAL	AIRLESS	CONV	HVLP	R/B
1	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-10C													
2	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-2000 (MS 200)													
3	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-375G	SAMPLE												
4	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-400G													
5	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-50													
6	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-5C													
7	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-7C													
8	AMERON PROTECTIVE COATINGS	923 (SOLVENT)													
9	AMERON PROTECTIVE COATINGS	AMERCOAT 101 (SOLVENT)													
10	AMERON PROTECTIVE COATINGS	AMERCOAT 15 (SOLVENT)													
11	AMERON PROTECTIVE COATINGS	AMERCOAT 182													
12	AMERON PROTECTIVE COATINGS	AMERCOAT 275E													

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Services Manual

## MANAGEMENT OF COATING PRODUCTS

Work Instruction No.: 103  
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13	AMERON PROTECTIVE COATINGS	AMERCOAT 277E													
14	AMERON PROTECTIVE COATINGS	AMERCOAT 3203													
15	AMERON PROTECTIVE COATINGS	AMERCOAT 3234													

DO NOT WRITE BELOW THIS LINE.





Hugo Bermudez  
<hbermude@nassco.com>  
12/07/2005 02:26 PM

To: Clint Seiter/R9/USEPA/US@EPA  
cc: John.Kolb@sdcounty.ca.gov  
bcc:  
Subject: RE: NASSCO Corrective Actions Update for December 7, 2005

History: This message has been replied to.

Clint:

ECAR 041: Disposal of the remaining materials in the hazmat area has been completed.

ECAR 043: Disposal of all silver recovery material has been completed and schedule implemented for future service.

Corrective actions have been taken and action plans have been implemented. As of today, all items have been completed.

If you have any questions or need clarification please don't hesitate to call me at 619 544 7780 or cell 619 997 2690.

Hugo

-----Original Message-----

**From:** Hugo Bermudez [mailto:hbermude@nassco.com]  
**Sent:** Thursday, December 01, 2005 3:24 PM  
**To:** 'seiter.clint@epa.gov'  
**Cc:** 'John.Kolb@sdcounty.ca.gov'  
**Subject:** NASSCO Corrective Actions Update 1 of 5

Clint:

Attached please find the updated corrective action forms indicated by a date. All items have now been completed except for the following:

ECAR 041: Some materials in the HazMat area have not been picked up by the disposal facility transporter as profile are currently being developed for the waste. This action is scheduled to be completed early next week.

ECAR 043: Currently scheduled to have Mary X-Ray (contractor) pick up and dispose of the silver recovery material in the photo lab and scheduled for 12/02/05.

As per our telecom, the paint was still within the 90 days after the expiration date. In addition, I have provided (attached to ECAR) Work Instruction 103 from the Paint Department which describes the management of expired paints and the paint inventory log. Please note that the Work Instruction was first issued December 1998 with a revision in December 2001 to include the handling of expired paints. All the paints have an expiration date either hand written on the container or printed bar code from the manufacture as described in the work instruction. I will provide you with a copy of the last paint inventory tomorrow as paint department personnel are gone for the day.

There are additional emails following this as I could not get all in one email due to size (5 total).

I forgot to ask in my last note if you wanted me to copy James Polek?

Please, if you have any questions or need clarification don't hesitate to contact me direct at 619 544 7780, cell at 619 997 2690 or via email.

Have a great weekend,

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | [hbermude@nassco.com](mailto:hbermude@nassco.com)



Hugo Bermudez  
<hbermude@nassco.com>  
12/22/2005 02:44 PM

To Clint Seiter/R9/USEPA/US@EPA  
cc John.Kolb@sdcounty.ca.gov  
bcc  
Subject NASSCO Inspection Update | 1 of 5

Clint:

Per your request, I have provided documentation for the items we discussed during our telecom on 12/14/2005.

I have attached disposal manifests for the following items:

- Fluorescent Light Tubes (fenced hazmat area)
- Non-PCB Light Ballasts (fenced hazmat area)
- Tri-Sodium Phosphate (fenced hazmat area)

The accumulation start date on containers inside the gated hazmat area reflect the date when the containers arrived at hazmat.

I have provided disposal and profiles for the following items:

- Spent X-Ray Negatives (fenced hazmat area)
- Low Pressure Sodium Vapor Lamps (fenced hazmat area)

The drum at the Pipe Shop with the funnel has been removed. An open top drum with a lid will be used. Its current practice to latch all funnels, I have attached the training slide.

Rags and other waste streams such as gloves should not be mixed in the same hazmat. This is part of NASSCO's on-going training. I have provided a work instruction and training slide.

If you have any questions or require clarification, please don't hesitate to call me at 619 544 7780 or cell 619 997 2690.

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



Manifest - Fluorescent tubes, alkaline and cad batteries.pdf

# NON-HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12 pitch) typewriter)

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No		Manifest Document No		2. Page 1 of	
3. Generator's Name and Mailing Address							
4. Generator's Phone ( )							
5. Transporter 1 Company Name		6. US EPA ID Number		A. State Transporter's ID			
				B. Transporter 1 Phone			
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID			
				D. Transporter 2 Phone			
9. Designated Facility Name and Site Address		10. US EPA ID Number		E. State Facility's ID			
				F. Facility's Phone			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		14. Unit Wt/Vol	
a.							
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information							
ALL DOCUMENTS PERTAINING TO THIS MANIFEST MUST REMAIN WITH THE SHIPMENT							
IMMEDIATELY DESTROYED 1-800-554-5544							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations							
Printed/Typed Name				Signature			
				Date			
17. Transporter 1 Acknowledgement of Receipt of Materials				Date			
Printed/Typed Name				Signature			
				Month Day Year			
18. Transporter 2 Acknowledgement of Receipt of Materials				Date			
Printed/Typed Name				Signature			
				Month Day Year			
19. Discrepancy Indication Space							
20. Facility Owner or Operator, Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name				Signature			
				Date			
				Month Day Year			

NON-HAZARDOUS WASTE

TRANSPORTER

FACILITY



Hugo Bermudez  
<hbermude@nassco.com>  
12/22/2005 02:46 PM

To Clint Seiter/R9/USEPA/US@EPA  
cc John.Kolb@sdcounty.ca.gov  
bcc  
Subject NASSCO Inspection Update | 2 of 5

2 of 5

**HUGO BERMUDEZ**, Environmental Engineering Specialist

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2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



Manifest - Ballast, alkaline batteries and vapour lamps.pdf

# NON-HAZARDOUS WASTE

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address 1000 W. 10th St. East Grand Rapids, MI 49503				4. Generator's Phone (616) 454-1111			
5. Transporter 1 Company Name Waste Management		6. US EPA ID Number 100000000000000000		A. State Transporter's ID			
7. Transporter 2 Company Name Waste Management		8. US EPA ID Number 100000000000000000		B. Transporter 1 Phone (616) 454-1111			
9. Designated Facility Name and Site Address Waste Management Services, LLC 1000 W. 10th St. East Grand Rapids, MI 49503		10. US EPA ID Number 100000000000000000		C. State Transporter's ID			
				D. Transporter 2 Phone (616) 454-1111			
				E. State Facility's ID			
				F. Facility's Phone (616) 454-1111			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		Unit	
a. NON-REGULATED BATTERIES - 100000000000000000				100 CF		1000	
b. UNIVERSAL WASTE - 100000000000000000				100 DF		1000	
c. UNIVERSAL WASTE - 100000000000000000				100 CF		1000	
d. UNIVERSAL WASTE - 100000000000000000							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
a. 1000-100000000000000000				1000			
b. 1000-100000000000000000				1000			
c. 1000-100000000000000000				1000			
15. Special Handling Instructions and Additional Information							
ALL DOCUMENTS PERTAINING TO THIS MANIFEST MUST REFERENCE DOCUMENT # 100000000000000000							
EMERGENCY RESPONSE: 1-800-274-6212							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name Dave Power		Signature Dave Power		Date 12/15/05		Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature J. H. H.		Date 12/15/05		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature J. H. H.		Date 12/15/05		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator, Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name J. H. H.		Signature J. H. H.		Date 12/15/05		Month Day Year	



Hugo Bermudez  
<hbermude@nassco.com>  
12/22/2005 02:47 PM

To Clint Seiter/R9/USEPA/US@EPA  
cc John.Kolb@sdcounty.ca.gov  
bcc  
Subject NASSCO Inspection Update | 3 of 5

3 of 5

**HUGO BERMUDEZ**, Environmental Engineering Specialist

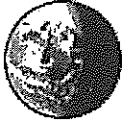
**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



Manifest - Trisodium phosphate, acetone, and zinc oxide.pdf

<b>UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)</b>		21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.	
23. Generator's Name				L. State Manifest Document Number		
				M. State Generator's ID		
24. Transporter Company Name		25. US EPA ID Number		N. State Transporter's ID		
26. Transporter Company Name		27. US EPA ID Number		O. Transporter's Phone		
				P. State Transporter's ID		
				Q. Transporter's Phone		
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		29. Containers		30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
		No.	Type			
a.						
b.						
c.						
d.						
e.						
f.						
g.						
h.						
i.						
S. Additional Descriptions for Materials Listed Above				T. Handling Codes for Wastes Listed Above		
a. 33-15697 A3315692RS c. 33-15091 A3315091MS h. 33-17357 A3317357TF d. 33-15110 A3315110MS						
32. Special Handling Instructions and Additional Information						
ALL DOCUMENTS PERTAINING TO THIS MANIFEST MUST REFERENCE DOCUMENT # 17-221 EVERY SPILL INCIDENT OF RELEASE INVOLVING ASHLAND CHEMICAL MUST BE REPORTED TO 1-800-ASHLAND, DAY OR NIGHT						
33. Transporter Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name		Signature		Month Day Year		
34. Transporter Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name		Signature		Month Day Year		
35. Discrepancy Indication Space						





Hugo Bermudez  
<hbermude@nassco.com>  
12/22/2005 02:48 PM

To: Clint Seiter/R9/USEPA/US@EPA  
cc: John.Kolb@sdcounty.ca.gov  
bcc:  
Subject: NASSCO Inspection Update | 4 of 5

4 of 5

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



Manifest - X-Ray negatives.pdf

UNIFORM HAZARDOUS  
WASTE MANIFEST

1 Generator's US EPA ID No		Manifest Document No		2 Page 1 of 1		Information in the shaded area is not required by Federal law.	
3 Generator's Name and Mailing Address NATIONAL STEEL SUPPLY CO. - NABCO PICK UP FROM: 7798 EAST HARBOR DRIVE SAN DIEGO, CA 92118 MAIL TO: PO BOX 45279 MS#17 SAN DIEGO, CA 92118		4 Generator's Phone (619) 548-7736		5 State Manifest Document Number 2452365		6 State Generator's ID	
7 Transporter 1 Company Name ASHLAND DISTRIBUTION		8 US EPA ID Number 04890100344		9 State Transporter's ID [Reserved]		10 Transporter's Phone (310) 323-2544	
11 Designated Facility Name and Site Address 601 - EAST CHICAGO 4841 KENNEDY AVE. EAST CHICAGO IN 46312		12 US EPA ID Number 11W1310044943		13 State Facility's ID		14 Facility's Phone (219) 307-3901	
15 US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		16 Containers No Type		17 Total Quantity		18 Unit Wt/Vol	
a. No hazardous waste, solid, white, NABCO, PO 111 (SILVER) XRAY FILM.		001 D F 000110				P 352	
b.						EPA/Other 0011	
c.						EPA/Other	
d.						EPA/Other	
19 Additional Descriptions for Materials Listed Above a. 33-15604 B3315604ND c.		20 Handling Codes for Wastes Listed Above a. b.		c. d.			
21 Special Handling Instructions and Additional Information a. 1) b. c. d.		22 ALL INVOICES MUST REFERENCE DOCUMENT # 3165603		23 EMERGENCY RESPONSE: 1-800-274-5263.			
24 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford		25 Printed/Typed Name DAVE BOWEN Agent		26 Signature Dave Bowen		27 Month Day Year 1/2/16/015	
28 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Juan Lopez		29 Signature		30 Month Day Year 1/2/16/015			
31 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		32 Signature		33 Month Day Year			
34 Discrepancy Indication Space							
35 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19 Printed/Typed Name		36 Signature		37 Month Day Year			

DO NOT WRITE BELOW THIS LINE.

# Ashland Distribution Company

## WASTE PROFILE

Site Code 3731  
Form Code BW409  
Source Code AG09

ASH 33-15604  
060101-903-M23

☐ Check here if this is a recertification

### GENERAL INFORMATION

Generator Name: National Steel and Shipbuilding Generator USEPA ID#: CAD 009 158 932  
Generator Address: 2798 East Harbor Drive Generator State ID#: \_\_\_\_\_  
San Diego, CA 92186 Billing Address: ASHLAND DISTRIBUTION COMPANY  
Technical Contact: Dave Powers 1851 E. First Street, Suite 700  
Phone: 619-544-7736 Santa Ana, CA 92705  
Fax: 619-544-7783 Billing Contact: Blair Collins  
Ashland Sales Rep: Tony Snyder Phone: 714-571-3269  
Phone: 714-571-4788 Fax: 714-571-3248  
Fax: 949-650-4960

### PROPERTIES AND COMPOSITION

Process Generating Waste: X-Ray Materials Processing  
Waste Name: X-Ray Film  
Is this a USEPA hazardous waste(40CFR Part 261)? Yes ☒ No ☐ Wastewater ☐ Non-wastewater ☒  
Identify ALL USEPA listed and characteristic waste code numbers: D011 State Waste Codes: 352  
Physical State @ 70 °F: Solid ☒ Liquid ☐ Both ☐ Single Layer ☒ Multilayer ☐ Free liquid range: 0 to 0 %  
pH: Range \_\_\_\_\_ to \_\_\_\_\_ OR N/A ☒ Strong odor ☐ Describe mild Color Gray  
Liquid Flash Point <73°F ☐ 73-99°F ☐ 100-139°F ☐ 140-199°F ☐ ≥200°F ☐ N/A ☒ Closed Cup ☐ Open Cup ☐

CHEMICAL COMPOSITION: List ALL constituents present in any concentration and forward available analysis.

Constituents	Range/Units	Constituents	Range/Units
X-Ray Film w/ Silver Halide	100%		
Residue			

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

Analytical data attached ☐

### SHIPPING INFORMATION

Packaging: Bulk Solid ☐ Bulk Liquid ☐ Drum ☒ Type/Size: \_\_\_\_\_ Other \_\_\_\_\_  
Anticipated volume: 2-3 drums Shipping Frequency: annually

### SAMPLING INFORMATION

Is a sample required? YES ☐ NO ☒ MSDS attached ☐  
Date Sampled: \_\_\_\_\_ Sampler's Name/Company: \_\_\_\_\_  
Generator's Agent Supervising Sampling: \_\_\_\_\_

### OTHER HAZARDOUS CHARACTERISTICS

Specific Gravity: Range: 1.0 to 1.1 OR Actual \_\_\_\_\_ UHC present ☐  
Is this a Benzene NESHAP Waste?: ☐ YES ☒ NO BTU Value (per pound): ☒ <5,000 OR ☐ >5,000

## GENERATOR'S WASTE MATERIAL PROFILE SHEET (CONTINUED)

ASH 33-15604

Profile #

CONTAMINANTS: ☒ TCLP ☐ TOTAL ☐ NONE IN THIS SECTION PRESENT

REGULATORY				REGULATORY			
EPA#	NAME	LEVEL	ACTUAL	EPA#	NAME	LEVEL	ACTUAL
D004	Arsenic	<input type="checkbox"/> >5.0		D024	m-Cresol	<input type="checkbox"/> >200.0	
D005	Barium	<input type="checkbox"/> >100.0		D025	p-Cresol	<input type="checkbox"/> >200.0	
D006	Cadmium	<input type="checkbox"/> >1.0		D026	Cresol (total)	<input type="checkbox"/> >200.0	
D007	Chromium	<input type="checkbox"/> >5.0		D027	1,4-Dichlorobenzene	<input type="checkbox"/> >7.5	
D008	Lead	<input type="checkbox"/> >5.0		D028	1,2-Dichloroethane	<input type="checkbox"/> >0.5	
D009	Mercury	<input type="checkbox"/> >0.2		D029	1,1-Dichloroethylene	<input type="checkbox"/> >0.7	
D010	Selenium	<input type="checkbox"/> >1.0		D030	2,4-Dinitrotoluene	<input type="checkbox"/> >.13	
D011	Silver	<input checked="" type="checkbox"/> >5.0		D031	Heptachlor	<input type="checkbox"/> >0.008	
D012	Endrin	<input type="checkbox"/> >0.02		D032	Hexachlorobenzene	<input type="checkbox"/> >0.13	
D013	Lindane	<input type="checkbox"/> >0.4		D033	Hexachloro-1,3-butadiene	<input type="checkbox"/> >0.5	
D014	Methoxychlor	<input type="checkbox"/> >10.0		D034	Hexachloroethane	<input type="checkbox"/> >3.0	
D015	Toxaphene	<input type="checkbox"/> >0.5		D035	Methyl ethyl ketone	<input type="checkbox"/> >200.0	
D016	2,4-D	<input type="checkbox"/> >10.0		D036	Nitrobenzene	<input type="checkbox"/> >2.0	
D017	2,4,5-TP (Silvex)	<input type="checkbox"/> >1.0		D037	Pentachlorophenol	<input type="checkbox"/> >100.0	
D018	Benzene	<input type="checkbox"/> >0.5		D038	Pyridine	<input type="checkbox"/> >5.0	
D019	Carbon tetrachloride	<input type="checkbox"/> >0.5		D039	Tetrachloroethylene	<input type="checkbox"/> >0.7	
D020	Chlordane	<input type="checkbox"/> >0.03		D040	Trichloroethylene	<input type="checkbox"/> >0.5	
D021	Chlorobenzene	<input type="checkbox"/> >100.0		D041	2,4,5 -Trichlorophenol	<input type="checkbox"/> >400.0	
D022	Chloroform	<input type="checkbox"/> >6.0		D042	2,4,6 -Trichlorophenol	<input type="checkbox"/> >2.0	
D023	o-Cresol	<input type="checkbox"/> >200.0		D043	Vinyl chloride	<input type="checkbox"/> >0.2	

## TRANSPORTATION INFORMATION

Is this a DOT Hazardous Material? ☒ Yes ☐ NoProper Shipping Name: RQ, Hazardous Waste Solid, n.o.s. (Silver)Hazard Class: 9 I.D.#: NA3077 Packing Group: III

Additional Description: \_\_\_\_\_

CERCLA Reportable Quantity (RQ): 1 RQ Units (lb/kg): lbs ERG# 171

SPECIAL HANDLING: \_\_\_\_\_

Additional Page(s) Attached ☐

## GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize disposer to obtain a sample from any waste shipment for purposes of recertification. If the waste stream or process generating the waste changes, I will notify Ashland Distribution Co. prior to shipment of the waste.

Will Lee  
Signature

T. MICHAEL CHIE ENV. MANAGER  
Printed (or typed) name and title

1/12/05  
Date



Hugo Bermudez  
<hbermude@nassco.com>  
12/22/2005 02:49 PM

To Clint Seiter/R9/USEPA/US@EPA  
cc John.Kolb@sdcounty.ca.gov  
bcc  
Subject NASSCO Inspection Update | 5 of 5

5 of 5

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



HazMatCoord Training Funnel.pdf HazmatCoord Training Rags-Gloves.pdf Sub Training Rags-Gloves.pdf



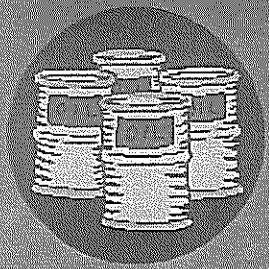
WI\_403\_Hazardous\_Waste\_Satellite\_Accumulation.pdf

# Hazardous Materials & Waste Containers

- Drums must be kept closed, except when adding or removing wastes.
- Drum Rings Must be kept Tight.
- Funnels Must be Latched.
- Clean up any minor spills (<1 quart) on or around drums immediately, IF IT IS SAFE TO DO SO. If it is not safe, CALL SECURITY AT x8401







# NASSCO Excluded Recyclable Material Label

Page 8

- White with Green Border Label/Sticker.
- Used Only on Materials Authorized by Environmental Engineering.
  - Shop Towels, Paint Solvent, Abrasive Blast Grit



# Excluded Recyclable Material

## Examples:


- Rags
- Spent Steel Abrasive
- Paint Solvent (GT 4637)

## Green Labels

Can have more than one drum of same ERM waste in area.

EXCLUDED RECYCLABLE MATERIAL	
GENERATOR INFORMATION:	
NAME	NATIONAL STEEL AND SHIPBUILDING CO.
ADDRESS	28TH ST. AND HARBOR DR.
CITY	SAN DIEGO
STATE	CA
ZIP	92113
ACCUMULATION START DATE	
ACCUMULATION END DATE	
CONTENTS, COMPOSITION:	
PHYSICAL STATE: <input type="checkbox"/> SOLID <input type="checkbox"/> LIQUID	
HAZARDOUS PROPERTIES: <input type="checkbox"/> FLAMMABLE <input type="checkbox"/> TOXIC <input type="checkbox"/> CORROSIVE <input type="checkbox"/> REACTIVE <input type="checkbox"/> OTHER	
<b>HANDLE WITH CARE!</b>	
SATELLITE ACCUMULATION	
SUBCONTRACTOR * DEPARTMENT	
VESSEL / LOCATION	




 Environmental Engineering Manual	Hazardous Waste Satellite Accumulation	Work Instruction No.: 403 Revision: C
--	--	---

Approved: \_\_\_\_\_  
T. Michael Chee  
Manager, Environmental Engineering

(Signed copy on file in originating department listed in footer)

**All printed copies are uncontrolled**  
and are obsolete as of midnight on the day printed. The user is responsible for verifying that any  
printed copy of this document is current before use.

Revision Record		
Revision	Date	Description of Change
A	05/25/01	Revised Section 1.0; Added References C through F; Added Definitions 4.2. & 4.3; Revised Section 5.1 & 5.2; Updated format & renumbered Section 6; Revised Sections 6.1, 6.1.4, 6.1.6, 6.1.7 and 6.1.9; Added Sections 6.1.11 through 6.2.3
B	10/12/01	Added Definitions 4.1.1, 4.1.2; Added Section 6.1.7, renumbered subsequent sections; Revised Sections 6.1.4, 6.1.5 and 6.1.13
C	04/24/03	Converted EEM Procedure No. 12 into Work Instruction No. 403.

 Environmental Engineering Manual	Hazardous Waste Satellite Accumulation	Work Instruction No.: 403 Revision: C
--	--	---

## 1.0 **Purpose:**

To describe NASSCO's methods for managing hazardous waste in Satellite Accumulation Sites.

## 2.0 **Scope:**


The activities, products, or services conducted at the NASSCO facility, that NASSCO can have an influence over, and that have the potential to cause a significant environmental impact.

## 3.0 **References:**

- (a) Environmental Engineering Manual, Forms Section, Hazardous Materials/Waste Transportation Tracking Form.
- (b) Environmental Engineering Manual, Work Instruction No. 401, Hazardous Materials/Waste Transportation Tracking.
- (c) Environmental Procedure Manual, Procedure No. 03, Environmental Training, Awareness & Competence.
- (d) Environmental Engineering Manual, Forms Section, HazMat Coordinator Roster.
- (e) Environmental Engineering Manual, Forms Section, Hazardous Material/Waste Weekly Inspection Checklist.
- (f) Environmental Engineering Manual, Forms Section, Hazardous Waste Satellite Accumulation Site Guidelines.

## 4.0 **Definitions:**

- 4.1 Satellite Accumulation Site – A designated area utilized for the accumulation of hazardous waste.
  - 4.1.1 Green Zone(s) – A Satellite Accumulation Site that is readily identifiable by a green crosshatched footprint.
  - 4.1.2 Red Zone(s) – Area designated for pick-up of hazardous waste that is readily identifiable by a red crosshatched footprint.
- 4.2 HazMat Coordinator – An individual assigned to a specific Hazardous Waste Satellite Accumulation Site(s) by their management. This person must have received annual Hazardous Materials Coordinators Training in accordance with Reference (c).

 Environmental Engineering Manual	Hazardous Waste Satellite Accumulation	Work Instruction No.: 403 Revision: C
--	--	---

4.3 HazMat Designee – An individual ultimately responsible for managing a Hazardous Waste Satellite Accumulation Site(s) in their area of responsibility. HazMat Designees are listed per Reference (d).

## 5.0 **Responsibility:**

5.1 HazMat Designees are responsible for ensuring that this procedure is followed.

5.2 HazMat Coordinators are responsible for labeling, handling, and monitoring the hazardous waste in their Satellite Accumulation Site.

## 6.0 **Procedure:**

6.1 HazMat Coordinators (Reference (d)) have been trained and are responsible for following NASSCO's instructions for Hazardous Waste Satellite Accumulation Sites as outlined below.

6.1.1 Determine the quantity and nature of the waste to be disposed of and proper waste handling procedures.

6.1.2 Contact HazMat, ext. 7736, to obtain waste accumulation drums.

6.1.3 Contact NASSCO Central Tool/Office Supplies for *Hazardous Waste Accumulation Labels* at ext. 3545.


6.1.4 The *Hazardous Materials/Waste Transportation Tracking Form*, Reference (a), the *Hazardous Material/Waste Weekly Inspection Checklist*, Reference (e) and the *Hazardous Waste Satellite Accumulation Site Guidelines*, Reference (f) are located in the Forms Section of the Environmental Engineering Manual, and are available in LiveLink.

6.1.5 Use 55-gallon or smaller drums for accumulating hazardous wastes (paint sludge, rags, wastewater, etc.). Remove any obsolete and/or inapplicable label(s).


6.1.6 Utilize metal drums for storing paints, solvents, petroleum products, and other flammable wastes. Typically these drums are painted orange or black.

6.1.7 Flammable liquid waste drums must be grounded until they are completely full and sealed closed.

6.1.8 Utilize plastic polydrums for storing corrosive materials. Typically these drums are blue or black.

 Environmental Engineering Manual	<b>Hazardous Waste Satellite Accumulation</b>	<b>Work Instruction</b> No.: 403 Revision: C
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- 6.1.9 The maximum quantity of a single type of hazardous waste in the Satellite Accumulation Site is 55 gallons.
- 6.1.10 Ensure that the hazardous waste container has a *Hazardous Waste Satellite Accumulation Label* attached on the side before placing waste into the container. As soon as waste first enters the container, enter the following onto the label:
- 6.1.10.1 **Accumulation Start Date:**
- 6.1.10.2 **Contents, Composition:** (Describe the waste, for example Waste Oil, Waste Paint, Oily rags, Paint Soaked Absorbents, etc)
- 6.1.10.3 **Physical State:** (Check or circle one: Solid, Liquid)
- 6.1.10.4 **Hazardous Properties:** (Check or circle one: Flammable, Toxic, Corrosive, Reactive, or enter the type of "Other")
- 6.1.10.5 **Subcontractor/Department** (Provide company name or NASSCO department name when requested on label)
- 6.1.10.6 **Vessel/Location** (Provide area where waste was generated when requested on the label)
- 6.1.11 Ensure that all hazardous waste is properly stored and protected from contact with the environment.
- 6.1.12 Do not mix different types of waste. If there is a need to dispose of a waste different than what is currently staged in the Satellite Accumulation Site, obtain a new drum.
- 6.1.13 When the container becomes full or 9 months have elapsed, prepare the container for transport to the HazMat Department. Enter the Accumulation End Date on the waste label.
- 6.1.14 The container must be transferred to a Red Zone or the HazMat Department within three days of the Accumulation End Date.
- 6.1.15 HazMat Coordinators are responsible for completing the *Hazardous Materials/Waste Transportation Tracking Form* at the same time the Accumulation End Date is entered on the *Hazardous Waste Satellite Accumulation Label*.
- 6.1.16 Insert the completed *Hazardous Material/Waste Transportation Tracking Form* into a plastic shipping envelope on the drum and write the date and "HAZMAT" on the outside of the

 Environmental Engineering Manual	Hazardous Waste Satellite Accumulation	Work Instruction No.: 403 Revision: C
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envelope. Contact NASSCO Transportation Department Dispatch at ext. 7581 for pick-up and transport to HazMat Department.

- 6.1.17 There is No Smoking or Open Flame within 50 feet of a Hazardous Waste Satellite Accumulation Site.
- 6.1.18 *Hazardous Waste Satellite Accumulation Site Guidelines* are considered “controlled documents” when located within the Environmental Engineering Manual. Copies made as handouts and for training purposes are considered “uncontrolled” and shall be verified for proper issue date with the Environmental Engineering Manual.
- 6.2 Satellite Accumulation Site Inspections
  - 6.2.1 HazMat Coordinators inspect Satellite Accumulation Sites weekly utilizing the *Hazardous Material/Waste Weekly Inspection Checklist*.
  - 6.2.2 At the end of each month, the HazMat Coordinator files the completed inspection checklists in their area.
  - 6.2.3 The Designated HazMat Coordinator or their supervisor retains the completed checklists for a minimum of one (1) year. These inspection checklists shall be readily available for review by an auditor upon request. Following the one-year retention period, these documents may be disposed of.
- 7.0 **Attachments:**
  - (1) Hazardous Waste Satellite Accumulation Label, sample format.



Environmental Engineering  
Manual

## Hazardous Waste Satellite Accumulation

Work Instruction  
No.: 403  
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### Attachment 1:

### Hazardous Waste Satellite Accumulation Label – Sample Format

HAZARDOUS WASTE SATELLITE ACCUMULATION	
<b>GENERATOR INFORMATION:</b>	
NAME	NATIONAL STEEL AND SHIPBUILDING CO.
ADDRESS	28TH ST. AND HARBOR DR.
CITY	SAN DIEGO
STATE	CA
ZIP	92113
ACCUMULATION START DATE	
ACCUMULATION END DATE	
CONTENTS, COMPOSITION:	
PHYSICAL STATE:	HAZARDOUS PROPERTIES:
• SOLID • LIQUID	• FLAMMABLE • TOXIC • CORROSIVE • REACTIVE • OTHER
SUBCONTRACTOR / DEPARTMENT	



**1.0. Purpose:**

To provide instructions for the management of coating products.

**2.0. Scope:**

All management of coating products in all stages of construction.

**3.0. References:**

- (a) NASSCO Blast, Paint, and General Services, Procedure No. 2, Surface Preparation and Paint
- (b) NASSCO Safety Manual, Hazardous Communication, Section 800
- (c) NASSCO Environmental Engineering, Procedure No. 3, Hazardous Materials/Waste Transportation Tracking
- (d) NASSCO Environmental Engineering, Procedure No. 12, Hazardous Waste Satellite Accumulation
- (e) San Diego Air Pollution Control District (APCD) Rules and Regulations
- (f) San Diego Air Pollution Control District (APCD) Permit to Operate 007657, Primeline
- (g) San Diego Air Pollution Control District (APCD) Permit to Operate 911437, Wood Products

**4.0 Definitions:**

None

**5.0 Responsibility:**

The Superintendent of Blast, Paint, and General Services is responsible for ensuring that this work instruction is implemented and followed. Additional responsibility is assigned in Reference (a).

**6.0 Procedure:**

**6.1 Receipt**

6.1.1 The process of receiving coatings from the coating supplier is detailed in Attachment (1), Receipt and Delivery of Coating Products Flow Chart.

6.1.2 The Paint Supervisor or Hazardous Material Coordinator at the satellite storage areas verifies, on receipt and/or delivery, that coating batch numbers are current. To aid verification, Attachment (2), Paint Batch Numbers Reference Tables for Paint Production, shall be posted in all satellite storage areas.

**6.2 Handling**

6.2.1 All coatings, approved according to Reference (b), are handled according to the coating manufacturer's Material Safety Data Sheet (MSDS). Copies of MSDS's are maintained by the Industrial Hygiene department.



6.3 Storage

6.3.1 All coatings are stored according to the coating manufacturer's Product Data Sheet (PDS) and Material Safety Data Sheet (MSDS). Copies of applicable PDS's are maintained by the Industrial Hygiene department.

6.3.2

- (1) Request through the department Material Coordinator that the coating supplier extend the shelf life of the coating and mark the product container as "Shelf Life Extended." The Material Coordinator shall maintain the paperwork.
- (2) Mark the product as "For Maintenance Use Only."
- (3)

6.4 Issue and Usage

6.4.1 Paint production will use the Paint Issue form (Attachment (3)) to order coating materials and the Paint Usage form (Attachment (4)) to record weekly use.

6.4.2 The department Material Coordinator will maintain the data from the issue and usage forms in their paper form and/or in a like database.

6.4.3 The department Material Coordinator will support the usage record keeping and reporting requirements defined in Reference (e), for the following coating operations:

- (1) Architectural Coatings (Rule 67.0)
- (2) Metal Parts and Products Coating Operations (Rule 67.3)
- (3) Wood Products Coating Operations (Rule 67.11)
- (4) Marine Coating Operations (Rule 67.18)
- (5) Motor Vehicles and Mobile Equipment Refinishing Operations (Rule 67.20)

6.4.4 In addition to the requirements defined in paragraph 6.4.3 above, the Material Coordinator or the SOC 1 Paint Supervisor shall ensure that the maximum usage requirements for the Primeline and Wood Products Operations, detailed in References (f) and (g), are not exceeded.

6.5 Paint Waste Management

6.5.1 Paint waste will be managed as detailed in References (c) and (d).





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## MANAGEMENT OF COATING PRODUCTS

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Revision: D

Approved: /s/ \_\_\_\_\_  
Judie Blakey  
Superintendent, Blast, Paint, and General Services

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Revision Record		
Revision	Date	Description of Change
---	12/18/98	
A	2/01/99	Process flowchart, along with referencing text, updated. Also, minor editorial change.
B	6/01/99	Attachment (4) revised. Also, minor editorial changes.
C	12/01/01	Reference to coating material approval added in para 6.1.1; handling of expired products added as para 6.4; Paint Usage form updated and set in landscape.
D	12/21/01	Re-Issue

WORK INSTRUCTION 103 REV D.doc

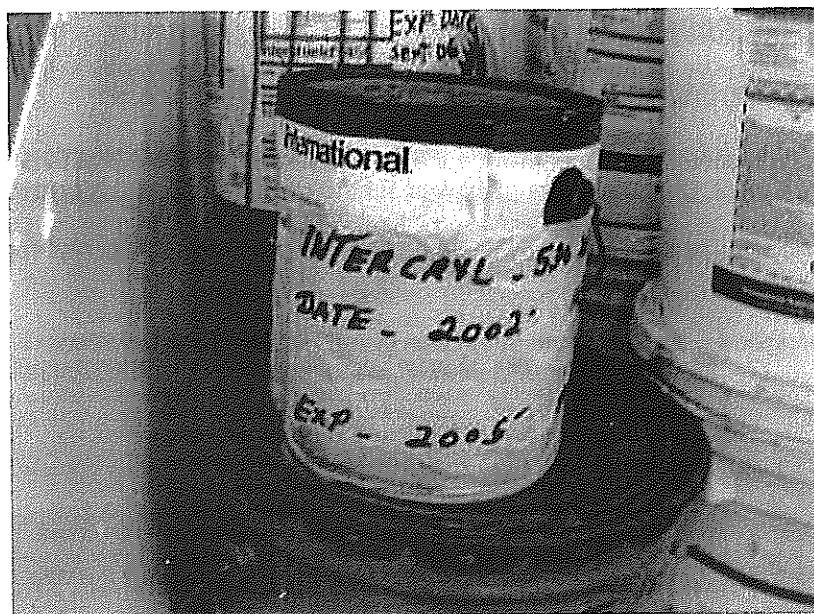
Before pictures: Paint Storage log lists all paints and expiration dates, expired paints are removed from the log and sent to hazmat for proper disposal. This form was last updated on November 29, 2005.

Paint Storage Inventory Controlled				
Paint Type	QTY in Gls	Expiration Date	Hull Specific?	Remarks
<b>International Paint:</b>				
Interclene 245-BRA570 (Blk)	170	Feb-2007	Y-BP	Underwater Hull
Interclene 245-BRA572 (Red)	225	Feb-2007	Y-BP	Underwater Hull
Interspeed 640-BRA640 (Red)	65	Jan-2007	Y-T-AKE	Underwater Hull
Interspeed 640-BRA640 (Red)	115	Jul-2007	Y-T-AKE	Underwater Hull
Interspeed 640-BRA642 (Blk)	84	Nov-2006	Y-T-AKE	Underwater Hull
Interspeed 640-BRA642 (Blk)	55	Dec-2006	Y-T-AKE	Underwater Hull
Interspeed 640-BRA642 (Blk)	45	Sept-2006	Y-T-AKE	Underwater Hull
Intercryl 530-DK Brown	9	Sept-2005	N	
Intercryl 530-Med Green	15	Apr-2006	N	
Intercryl 530-Signal Blue	15	Sept-2006	N	
Interlac Haze Gray	5	Apr-2006	N	
Interline 92503-Buff	55	Mar-2006	Y-T-AKE	
Interplate 997-Nippe	5	Dec-2006	N	
Intershield 556-DK Gray	5	Jan-2007	N	Need 1 gl of reactor
Interthane 990-Red	7	Aug-2007	N	
Intertuf 262-KHA302 (Gray)	10	Apr-2007	N	
Intergard 403-KBA401(Off White)	10	Mar-2006	N	Need 2 gls of reactor
Intergard 631-Gray	5	Dec-2006		Upgrade commercial non-skid
Intergard 621-DK Gray	5	Jan-2007	N	Non-skid EK5040H
Interline 624-THA664 (Red)	75	Jun-2007	Y-T-AKE	
<b>Pro-Line:</b>				
F-34 Binder	5	Feb-2007	N	
26307-Bulkhead Gray	5	Feb-2007	N	
F-42 Med Yellow	4	Feb-2007	N	
F-1000 White	3	Feb-2007	N	
F-424 Pure White	1	Feb-2007	N	
10-Black	1	Feb-2007	N	
<b>Devoe:</b>				
PSX700-Safety Blue	4	Sept-2006	Y-T-AKE	
PSX700-Safety Red	24	Nov-2006	Y-T-AKE	
PSX700-Safety Yellow	34	Oct-2007	Y-T-AKE	
PSX700-Safety Red	6	Apr-2007	Y-BP	
PSX700-Black	2	Apr-2007	Y-BP	
PSX700-Black	2	Jun-2007	Y-T-AKE	
PSX700-White	30	Feb-2008	Y-T-AKE	
<b>Sherwin Williams-Water Base</b>			Asphalt paint for walk-ways	
Sher-cryl-Safety Blue	5	Jul-2007	N	
Sher-cryl-Safety White	20	Jul-2008	N	
Sher-cryl-Safety Green	12	Aug-2007	N	
<b>Miscellaneous</b>				
VPCI-Oil Concentrate	55		T-AKE	
VPCI-Oil Concentrate-322	110			
Tectyl 891D	275			
Tectyl 511M	55			
Cosmoline	110			

Before pictures: The paint had an expiration date of August 2005 (still within the 90 days), paint will be disposed before the 90 days. Manifest for the spent paint is attached to this report and the paint is indicated by "Paint Solids" on the manifest.



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2048x1536/24b.jpg



## Environmental Corrective Action Request (ECAR)

EC-2005-044

ISSUED DATE: 11/17/2005

Issued To: Blast & Paint (16)

Reported By: John Martin

Judie Blakey  
Superintendent, Production  
Phone: (619) 544-8443  
Mailstop: 02

Environmental Engineering  
Phone: (619) 544-3553  
Fax: (619) 744-1088  
Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 or as an email message directed to the Issuing Engineer referencing EC-2005-044, to ensure that you meet the required deadline. Please reference EC-2005-044 on any attachments that are submitted.

### Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Small Parts Painting area - Paint Storage. The following item of non-compliance were noted that need corrective action:

1. A number of one gallon paint containers has no expiration dates on the paint containers.
2. One 5 gallon paint can had a expiration date August 2005 with no decision made as to the disposal or recycling of the paint container

### Regulatory and/or EMS Reference:

### Corrective Action Response:

The department was unaware of the regulation 40 CFR 262.11 about expired paint. There is no statement in the ISO 14001 reference guide.

Hugo Bermudez, Environmental Engineer provide the department with the 40 CFR 626.11 regulation to reference the expired paint. The discrepant paint was sent to hazardous waste for disposal.

Our department policy has been to send any expired paint back to the main paint storage site for disposition.

All department supervision will be informed at the weekly staff meeting (next meeting 11/28/05) and there will be a handout for them to present the information to their crews in their 5-minute morning meeting.

/s/ Juan Saludes on 11/22/2005



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### 7.0 Attachments:

- (1) Process Flowchart for the Request and Delivery of Paint
- (2) Paint Batch Reference Numbers Reference Tables for Paint Production (SAMPLE)
- (3) Paint Issue Form
- (4) Paint Usage All Areas Form (SAMPLE)



(1) Process Flowchart for the Request and Delivery of Paint

**PRODUCTION**

**MATERIAL COORDINATOR**

**SUPPLIER**

Review Long Range  
Schedules  
(1)

Determine Pallets  
to Release  
(2)

Extract Pallets  
From Internal  
Spreadsheet  
(3)

Approve Release  
Against  
Purchase Order  
(4)

Fax or Email  
Approved Releases  
to Coating Supplier  
(5)


Kit Material Per  
Request  
(6)

Review  
Approve/Disapprove  
Receivers and Deliver  
to Material  
Coordinator  
(8)

Update Internal  
Spreadsheet  
(9)

Deliver Material  
(7)

Post Receivers  
(10)

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(2) Paint Batch Reference Numbers Reference Tables for Paint Production (SAMPLE)

**TABLE 1. IDENTIFYING YEAR AND MONTH INFORMATION FROM BATCH NUMBERS**

COATING	EXAMPLE BATCH #	YEAR CODE	YEAR	MONTH/DAY CODE	MONTH
AMERON	L R 2002 0 1 3 2 7 0	2002	2002	01	JANUARY
DEVOE	L R 2002 0 5 0 2 0 8	2002	2002	05	MAY
INTERNATIONAL	2 M 6 6 4 6 U U A 6	2	2002	M	DECEMBER
INTERNATIONAL	C B 1 2 3 4 U H A 1	C	2002	B*	FEBRUARY
PROLINE	7 6 7 0 C 2	2	2002	C	MARCH
SHERWIN WILLIAMS	P M 0 5 0 2 A	2	2002	050**	FEBRUARY 20
SIGMA	02 0 8 - 0 0 1 1	02	2002	08	AUGUST

\*INTERNATIONAL REVISED ITS BATCH NUMBERING SYSTEM BEGINNING IN JANUARY 2000. FOR BATCHES PRIOR TO THAT DATE THE OLD SYSTEM IS STILL IN AFFECT.

\*\*SHERWIN WILLIAMS IDENTIFIES THE BATCH BY YEAR AND BY DAY OF THE YEAR. IN THE EXAMPLE ABOVE, ?050" IS THE FIFTIETH DAY OF 2002.

**TABLE 2. IDENTIFYING MONTH OF MANUFACTURE, MAIN COATING SUPPLIERS**

INTERNATIONAL**	PROLINE	AMERON, DEVOE, AND SIGMA
A = JANUARY	A = JANUARY	01 = JANUARY
B = FEBRUARY	B = FEBRUARY	02 = FEBRUARY
C = MARCH	C = MARCH	03 = MARCH
D = APRIL	D = APRIL	04 = APRIL
E = MAY	E = MAY	05 = MAY
F = JUNE	F = JUNE	06 = JUNE
G = JULY	G = JULY	07 = JULY
H = AUGUST	H = AUGUST	08 = AUGUST
J = SEPTEMBER	I = SEPTEMBER	09 = SEPTEMBER
K = OCTOBER	J = OCTOBER	10 = OCTOBER
L = NOVEMBER	K = NOVEMBER	11 = NOVEMBER
M = DECEMBER	L = DECEMBER	12 = DECEMBER

\*\*INTERNATIONAL DOES NOT USE THE LETTER 'I'

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(3) Paint Issue Form

### PAINT ISSUE

TO  
FROM

DATE

DELIVERY LOCATION

CHARGE NUMBER

PAINT/ SOLVENT	AMOUNT (GALS)	UNIT, ZONE, COMPARTMENT, TANK NUMBER	SQUARE FEET	GALS SENT	BATCH NUMBER			
					PAINT	GALS	CONVERTOR REACTOR	GALS

SUPERVISOR'S SIGNATURE \_\_\_\_\_

SHIPPER'S SIGNATURE \_\_\_\_\_

1. FILL OUT THIS FORM COMPLETELY. USE SEPARATE SHEET FOR EACH CHARGE NUMBER.
2. SUBMIT COMPLETED FORM TO MATERIAL COORDINATOR/SR PLANNER SCHEDULER.
3. PAINT WILL BE DELIVERED ACCORDING TO JUST IN TIME SCHEDULE.

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TO  
FROM

DATE

4. SECOND SHIFT MUST FILL OUT THIS FORM AND LEAVE IT IN THE MAILBOX OF THE MATERIAL COORDINATOR.

5. BATCH NUMBERS ARE PROVIDED BY THE PAINT SHIPPER.

(4) Paint Usage All Areas Form (SAMPLE)

DATE:

RULE: (CIRCLE)

MARINE

ARCH

METAL

WOOD

LOCATION:

SUPERVISOR/SUBCONTRACTOR:

REF	VENDOR NAME	PRODUCT NAME	VOC	GALLONS USED EACH DAY AND TOTAL FOR WEEK								METHOD USED (REPORT IN GALLONS)			
NO				MON	TUE	WED	THU	FRI	SAT	SUN	TOTAL	AIRLESS	CONV	HVLP	R/B
1	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-10C													
2	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-2000 (MS 200)													
3	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-375G	<b>SAMPLE</b>												
4	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-400G													
5	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-50													
6	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-5C													
7	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-7C													
8	AMERON PROTECTIVE COATINGS	923 (SOLVENT)													
9	AMERON PROTECTIVE COATINGS	AMERCOAT 101 (SOLVENT)													
10	AMERON PROTECTIVE COATINGS	AMERCOAT 15 (SOLVENT)													
11	AMERON PROTECTIVE COATINGS	AMERCOAT 182													
12	AMERON PROTECTIVE COATINGS	AMERCOAT 275E													

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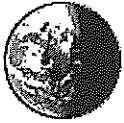
## MANAGEMENT OF COATING PRODUCTS

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13	AMERON PROTECTIVE COATINGS	AMERCOAT 277E													
14	AMERON PROTECTIVE COATINGS	AMERCOAT 3203													
15	AMERON PROTECTIVE COATINGS	AMERCOAT 3234													

DO NOT WRITE BELOW THIS LINE.

Yellow GENKATOR RETAINS



Hugo Bermudez  
<hbermude@nassco.com>  
01/12/2006 01:31 PM

To Clint Seiter/R9/USEPA/US@EPA  
cc John.Kolb@sdcounty.ca.gov  
bcc  
Subject NASSCO Inspection - Action Items Update (1 of 3)

Mr. Seiter:

Here are the updates for the two action items we discussed during our telecom on January 5, 2006.

a) NASSCO Contingency/Business Plan layouts do not show or identify fire extinguishers and spill kits.  
- All contingency plans have been updated to reflect the fire extinguisher locations  
- Spill kits are not listed in the plans because not all yard personnel are trained to respond and clean up spills. NASSCO has an onsite response team (Fire Department) for responding to spill incidents.

b) Oil storage tanks at the Waste Water Treatment Facility (6,000 Gal) and the Vehicle Maintenance area (250 Gal) are identified as "Waste Oil". Oil stored or held for recycling shall be identified as used oil.  
- Both oil tanks have been labeled with the words "Used Oil".

I have included with this note the updated contingency/business plan layouts and pictures of the two subject tanks for your review. If you need additional information or clarification, please don't hesitate to call me.

Also, have you completed the flip-top drum lids section of the report? If so, I would like to get information and further discuss with you.

Thanks,

**HUGO BERMUDEZ**, Environmental Engineering Specialist

**NASSCO**, a General Dynamics Company  
2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



Oil Tanks before and after.pdf



Site 02 hazwaste storage Layout1 (1).pdf



Site 01 yard layout Layout1 (1).pdf



Site 03 waste water treatment facility Layout1 (1).pdf